



MET Laboratories, Inc. *Safety Certification - EMI - Telecom Environmental Simulation*

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August 12, 2016

Qvivr
3375 Scott Blvd., #139
Santa Clara, CA 95054

Dear Sumukh Pathare,

Enclosed is the EMC Wireless test report for compliance testing of the Qvivr, SwypCard as tested to the requirements of Title 47 of the CFR, Ch. 1 (10-1-06 ed.), Part 15 Subpart C for Intentional Radiators.

Thank you for using the services of MET Laboratories, Inc. If you have any questions regarding these results or if MET can be of further service to you, please feel free to contact me.

Sincerely yours,
MET LABORATORIES, INC.

Jennifer Warnell
Documentation Department

Reference: (\Qvivr\EMCS89654-FCC247 Rev. 1)

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Electromagnetic Compatibility Criteria Test Report

for the

**Qvivr
SwypCard**

Tested under
the FCC Certification Rules
contained in
15.247 Subpart C for Intentional Radiators

MET Report: EMCS89654-FCC247 Rev. 1

August 12, 2016

Prepared For:

**Qvivr
3375 Scott Blvd., #139
Santa Clara, CA 95054**

Prepared By:
MET Laboratories, Inc.
914 W. Patapsco Ave.
Baltimore, MD 21230

Electromagnetic Compatibility Criteria Test Report

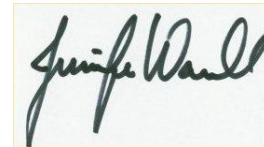
for the

**Qvivr
SwypCard**

Tested under
the FCC Certification Rules
contained in
15.247 Subpart C for Intentional Radiators



Ajaz Khan, Project Engineer
Electromagnetic Compatibility Lab



Jennifer Warnell
Documentation Department

Engineering Statement: The measurements shown in this report were made in accordance with the procedures indicated, and the emissions from this equipment were found to be within the limits applicable. I assume full responsibility for the accuracy and completeness of these measurements, and for the qualifications of all persons taking them. It is further stated that upon the basis of the measurements made, the equipment tested is capable of operation in accordance with the requirements of the FCC Rules Part 15.247 under normal use and maintenance.



Asad Bajwa,
Director, Electromagnetic Compatibility Lab

Report Status Sheet

Revision	Report Date	Reason for Revision
Ø	June 23, 2016	Initial Issue.

Table of Contents

I.	Executive Summary	1
	A. Purpose of Test	2
	B. Executive Summary	2
II.	Equipment Configuration	3
	A. Overview.....	4
	B. References.....	4
	C. Test Site	5
	D. Description of Test Sample.....	5
	E. Equipment Configuration.....	6
	F. Support Equipment	6
	G. Mode of Operation.....	6
	H. Method of Monitoring EUT Operation	7
	I. Modifications	7
	a) Modifications to EUT	7
	b) Modifications to Test Standard.....	7
	J. Disposition of EUT	7
III.	Electromagnetic Compatibility Criteria for Intentional Radiators.....	8
	§ 15.203 Antenna Requirement	9
	§ 15.207(a) Conducted Emissions Limits	10
	§ 15.247(a)(a) 6 dB and 99% Bandwidth	11
	§ 15.247(b) Peak Power Output	14
	§ 15.247(d) Radiated Spurious Emissions Requirements and Band Edge.....	17
	§ 15.247(d) RF Conducted Spurious Emissions Requirements and Band Edge.....	24
	§ 15.247(e) Peak Power Spectral Density	28
	§ 15.247(i) RF Exposure (SAR Exemption).....	31
IV.	Test Equipment	32
V.	Certification & User's Manual Information	34
	A. Certification Information	35
	B. Label and User's Manual Information	39

List of Tables

Table 1. Executive Summary of EMC Part 15.247 Compliance Testing	2
Table 2. EUT Summary Table.....	4
Table 3. References	4
Table 4. Equipment Configuration	6
Table 5. Support Equipment.....	6
Table 6. Conducted Limits for Intentional Radiators from FCC Part 15 § 15.207(a)	10
Table 7. 6 dB Occupied Bandwidth, Test Results	12
Table 8. Output Power Requirements from §15.247(b)	14
Table 9. Peak Power Output, Test Results	15
Table 10. Restricted Bands of Operation.....	17
Table 11. Radiated Emissions Limits Calculated from FCC Part 15, § 15.209 (a)	18
Table 12. Peak Power Spectral Density, Test Results	29
Table 13. Test Equipment List	33

List of Plots

Plot 1. 6 dB Occupied Bandwidth, Low Channel.....	13
Plot 2. 6 dB Occupied Bandwidth, Mid Channel	13
Plot 3. 6 dB Occupied Bandwidth, High Channel.....	13
Plot 4. Peak Power Output, Low Channel	16
Plot 5. Peak Power Output, Mid Channel.....	16
Plot 6. Peak Power Output, High Channel	16
Plot 7. Radiated Spurious Emissions, Low Channel, 30 MHz – 1 GHz.....	19
Plot 8. Radiated Spurious Emissions, Low Channel, 1 GHz – 18 GHz, Average	19
Plot 9. Radiated Spurious Emissions, Low Channel, 1 GHz – 18 GHz, Peak.....	19
Plot 10. Radiated Spurious Emissions, Mid Channel, 30 MHz – 1 GHz	20
Plot 11. Radiated Spurious Emissions, Mid Channel, 1 GHz – 18 GHz, Average	20
Plot 12. Radiated Spurious Emissions, Mid Channel, 1 GHz – 18 GHz, Peak	20
Plot 13. Radiated Spurious Emissions, High Channel, 30 MHz – 1 GHz	21
Plot 14. Radiated Spurious Emissions, High Channel, 1 GHz – 18 GHz, Average	21
Plot 15. Radiated Spurious Emissions, High Channel, 1 GHz – 18 GHz, Peak	21
Plot 16. Radiated Restricted Band Edge, Low Channel, Peak vs. Average	22
Plot 17. Radiated Restricted Band Edge, High Channel, Peak vs. Average	22
Plot 18. Spurious Emissions, Low Channel, 30 MHz – 1 GHz.....	25
Plot 19. Spurious Emissions, Low Channel, 1 GHz – 18 GHz.....	25
Plot 20. Spurious Emissions, Mid Channel, 30 MHz – 1 GHz.....	25
Plot 21. Spurious Emissions, Mid Channel, 1 GHz – 18 GHz	26
Plot 22. Spurious Emissions, High Channel, 30 MHz – 1 GHz	26
Plot 23. Spurious Emissions, High Channel, 1 GHz – 18 GHz	26
Plot 24. Band Edge, Low Channel	27
Plot 25. Band Edge, High Channel.....	27
Plot 26. Peak Power Spectral Density, Low Channel.....	30
Plot 27. Peak Power Spectral Density, Mid Channel	30
Plot 28. Peak Power Spectral Density, High Channel	30

List of Figures

Figure 1. Block Diagram of Test Configuration.....	5
Figure 2. Peak Power Output Test Setup.....	14

Figure 3. Block Diagram, Spurious Emissions Test Setup	24
Figure 4. Block Diagram, Peak Power Spectral Density Test Setup	28

List of Photographs

Photograph 1. Radiated Spurious Emissions, Test Setup, 30 MHz – 1 GHz.....	23
Photograph 2. Radiated Spurious Emissions, Test Setup, 1 GHz – 18 GHz	23

List of Terms and Abbreviations

AC	Alternating Current
ACF	Antenna Correction Factor
Cal	Calibration
<i>d</i>	Measurement Distance
dB	Decibels
dBμA	Decibels above one microamp
dBμV	Decibels above one microvolt
dBμA/m	Decibels above one microamp per meter
dBμV/m	Decibels above one microvolt per meter
DC	Direct Current
E	Electric Field
DSL	Digital Subscriber Line
ESD	Electrostatic Discharge
EUT	Equipment Under Test
<i>f</i>	Frequency
FCC	Federal Communications Commission
GRP	Ground Reference Plane
H	Magnetic Field
HCP	Horizontal Coupling Plane
Hz	Hertz
IEC	International Electrotechnical Commission
kHz	kilohertz
kPa	kilopascal
kV	kilovolt
LISN	Line Impedance Stabilization Network
MHz	Megahertz
μH	microhenry
μ	microfarad
μs	microseconds
NEBS	Network Equipment-Building System
PRF	Pulse Repetition Frequency
RF	Radio Frequency
RMS	Root-Mean-Square
TWT	Traveling Wave Tube
V/m	Volts per meter
VCP	Vertical Coupling Plane

I. Executive Summary

A. Purpose of Test

An EMC evaluation was performed to determine compliance of the Qvivr SwypCard, with the requirements of Part 15, §15.247. All references are to the most current version of Title 47 of the Code of Federal Regulations in effect. In accordance with §2.1033, the following data is presented in support of the Certification of the SwypCard. Qvivr should retain a copy of this document which should be kept on file for at least two years after the manufacturing of the SwypCard, has been **permanently** discontinued.

B. Executive Summary

The following tests were conducted on a sample of the equipment for the purpose of demonstrating compliance with Part 15, §15.247, in accordance with Qvivr, purchase order number 160418_METLABS. All tests were conducted using measurement procedure ANSI C63.4-2014.

FCC Reference 47 CFR Part 15.247:2005	Description	Compliance
Title 47 of the CFR, Part 15 §15.203	Antenna Requirement	Compliant
Title 47 of the CFR, Part 15 §15.207(a)	Conducted Emission Limits	Not Applicable
Title 47 of the CFR, Part 15 §15.247(a)(2)	6dB Occupied Bandwidth	Compliant
Title 47 of the CFR, Part 15 §15.247(b)	Peak Power Output	Compliant
Title 47 of the CFR, Part 15 §15.247(d); §15.209; §15.205	Radiated Spurious Emissions Requirements	Compliant
Title 47 of the CFR, Part 15 §15.247(d)	RF Conducted Spurious Emissions Requirements	Compliant
Title 47 of the CFR, Part 15 §15.247(d)	RF Conducted Band Edge	Compliant
Title 47 of the CFR, Part 15; §15.247(e)	Peak Power Spectral Density	Compliant
Title 47 of the CFR, Part 15 §15.247(i)	RF Exposure SAR Exemption	Compliant

Table 1. Executive Summary of EMC Part 15.247 Compliance Testing

II. Equipment Configuration

A. Overview

MET Laboratories, Inc. was contracted by Qvivr to perform testing on the SwypCard, under Qvivr's purchase order number 160418_METLABS.

This document describes the test setups, test methods, required test equipment, and the test limit criteria used to perform compliance testing of the Qvivr, SwypCard.

The results obtained relate only to the item(s) tested.

Model(s) Tested:	SwypCard		
Model(s) Covered:	SwypCard		
EUT Specifications:	Primary Power: 3 VDC		
	FCC ID: 2AIUI-160620		
	Type of Modulations:	GFSK	
	Equipment Code:	DTS	
	Peak RF Output Power:	-31.05 dBm	
	EUT Frequency Ranges:	2402-2480 MHz	
Analysis:	The results obtained relate only to the item(s) tested.		
Environmental Test Conditions:	Temperature: 15-35° C		
	Relative Humidity: 30-60%		
	Barometric Pressure: 860-1060 mbar		
Evaluated by:	Ajaz Khan		
Report Date(s):	August 12, 2016		

Table 2. EUT Summary Table

B. References

CFR 47, Part 15, Subpart C	Federal Communication Commission, Code of Federal Regulations, Title 47, Part 15: General Rules and Regulations, Allocation, Assignment, and Use of Radio Frequencies
ANSI C63.4:2014	Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical And Electronic Equipment in the Range of 9 kHz to 40 GHz
ISO/IEC 17025:2005	General Requirements for the Competence of Testing and Calibration Laboratories
ANSI C63.10-2013	American National Standard for Testing Unlicensed Wireless Devices

Table 3. References

C. Test Site

All testing was performed at MET Laboratories, Inc., 3162 Belick St., Santa Clara, CA 95054. All equipment used in making physical determinations is accurate and bears recent traceability to the National Institute of Standards and Technology.

Radiated Emissions measurements were performed in a 3 meter semi-anechoic chamber (equivalent to an Open Area Test Site). In accordance with §2.948(a)(3), a complete site description is contained at MET Laboratories.

D. Description of Test Sample

The Qvivr SwypCard, Equipment Under Test (EUT), is a credit card form factor device which can be connected to a Smart Phone. It has dynamic magnetic strip that can emulate a regular magnetic strip of a credit card or any loyalty card that has magnetic strip data. It has flexible graphical display, three button for user interaction. It can consolidate credit cards, store loyalty cards, gift cards.

User downloads information to SWYP Card using a smart phone over Bluetooth SMART interface.

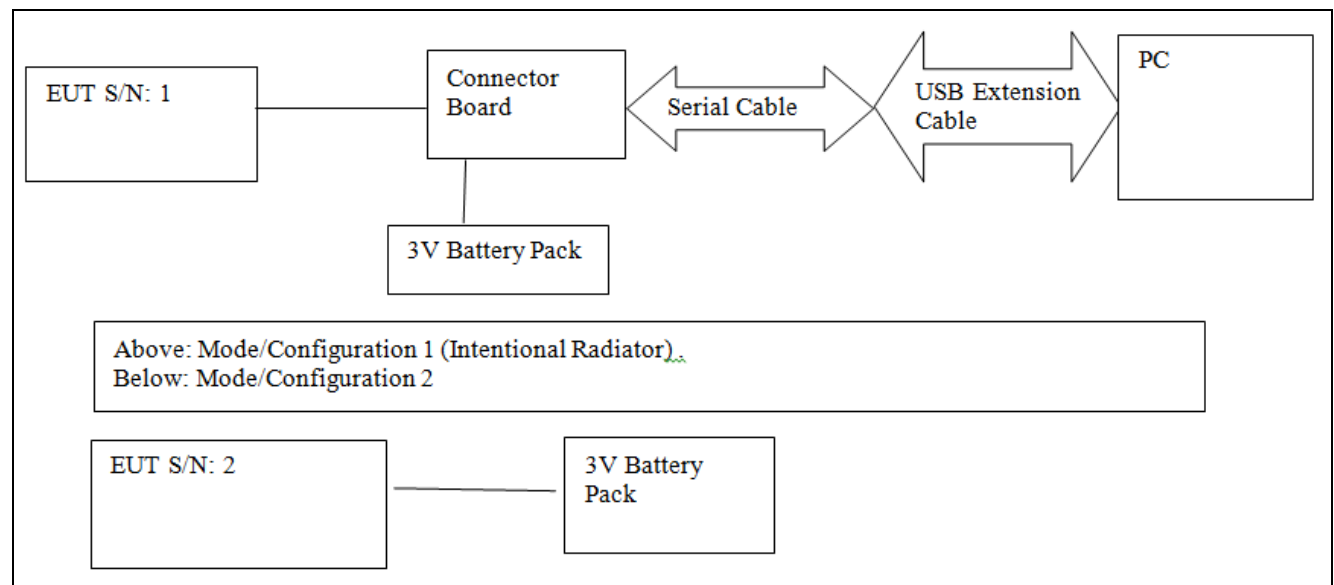


Figure 1. Block Diagram of Test Configuration

E. Equipment Configuration

The EUT was set up as outlined in Figure 1, Block Diagram of Test Setup. All cards, racks, etc., incorporated as part of the EUT is included in the following list.

Ref. ID	Name / Description	Model Number	Part Number	Serial Number	Revision
1	Swypcard	5EX	900-00003-02	1	Y
2	Swypcard	5EX	900-00003-02	2	Y

Table 4. Equipment Configuration

F. Support Equipment

Support equipment necessary for the operation and testing of the EUT is included in the following list.

Ref. ID	Name / Description	Manufacturer	Model Number
1	Serial cable	FTDI	USB-RS232-PCBA
2	USB extension cable	Newlink Solutions	NLUSB2-REP15
3	Connector Board	Qvivr	N/A
4	PC	Lenovo	S21e
5	Battery Pack	Qvivr	N/A

Table 5. Support Equipment

G. Mode of Operation

SWYP Card will be tested in two different modes:

Mode1: This mode will be used for intentional radiator testing. SWYP Card will transmit RF signal in 2.402 GHz to 2.480GHz band. To transmit RF signal the card will be connected to an external battery pack and a PC. The PC will send commands to the card over serial cable. Card can be configured to transmit any RF carrier within the band and modulate data.

Mode 2: In this mode the card will emulate end user use case. The card will be connected to an external battery pack (internal battery is not capable of continuous operation). The card will continually update data on the screen and carry out its internal operation of detecting magnetic head.

H. Method of Monitoring EUT Operation

The device is used in two modes. Mode 1 is intentional radiator. Mode 2 is emulate end user use.

Mode 1: If the device is not performing as expected, serial port traffic will not be observed. Device will not respond to data over serial port.

Mode 2: If the device is not performing as expected the LCD will stop updating.

I. Modifications

a) Modifications to EUT

No modifications were made to the EUT.

b) Modifications to Test Standard

No modifications were made to the test standard.

J. Disposition of EUT

The test sample including all support equipment submitted to the Electro-Magnetic Compatibility Lab for testing was returned to Qvivr upon completion of testing.

III. Electromagnetic Compatibility Criteria for Intentional Radiators

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.203 Antenna Requirement

Test Requirement: § 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.

The structure and application of the EUT were analyzed to determine compliance with Section 15.203 of the Rules. Section 15.203 states that the subject device must meet at least one of the following criteria:

- a.) Antenna must be permanently attached to the unit.
- b.) Antenna must use a unique type of connector to attach to the EUT.
- c.) Unit must be professionally installed. Installer shall be responsible for verifying that the correct antenna is employed with the unit.

Results: The EUT as tested is compliant the criteria of §15.203. The device had a professionally installed integrated antenna.

Test Engineer(s): Ajaz Khan

Test Date(s): 05/27/16

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.207(a) Conducted Emissions Limits

Test Requirement(s): § 15.207 (a): 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 30MHz, shall not exceed the limits in the following table, as measured using a 50 μ H/50 Σ 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 frequency ranges.

Frequency range (MHz)	§ 15.207(a), Conducted Limit (dB μ V)	
	Quasi-Peak	Average
* 0.15- 0.45	66 - 56	56 - 46
0.45 - 0.5	56	46
0.5 - 30	60	50

Table 6. Conducted Limits for Intentional Radiators from FCC Part 15 § 15.207(a)

Test Results: The EUT was not applicable with this requirement. The device is battery powered hence, this test does not apply.

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(a)(2) 6 dB Bandwidth

Test Requirements: § 15.247(a)(2): Operation under the provisions of this section is limited to frequency hopping and digitally modulated intentional radiators that comply with the following provisions:

For systems using digital modulation techniques, the EUT may operate in the 902-928 MHz, 2400-2483.5 MHz and 5725-5850 MHz bands. The minimum 6dB bandwidth shall be at least 500 kHz.

Test Procedure: The transmitter was on and transmitting at the highest output power. The bandwidth of the fundamental frequency was measured with the spectrum analyzer using a RBW approximately 1% of the total emission bandwidth, VBW > RBW. The 6 dB Bandwidth was measured and recorded. The measurements were performed on the low, mid and high channels. The device did not have a conducted port so the testing was done radiated.

Test Results The EUT was compliant with § 15.247 (a)(2).

The 6 dB Bandwidth was determined from the plots on the following pages.

Test Engineer(s): Ajaz Khan

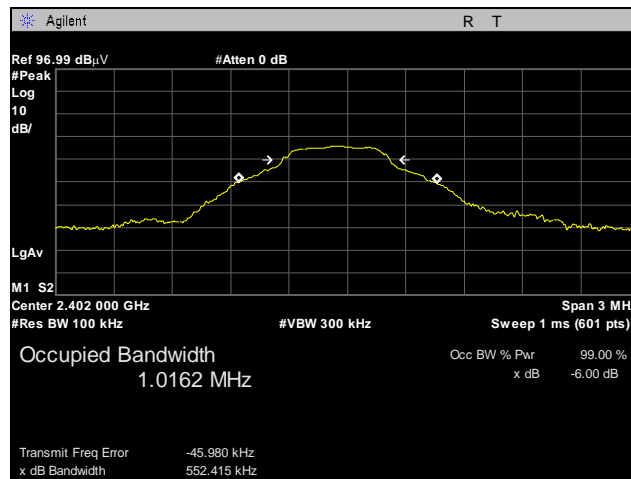
Test Date(s): 05/27/16

Occupied Bandwidth Test Results

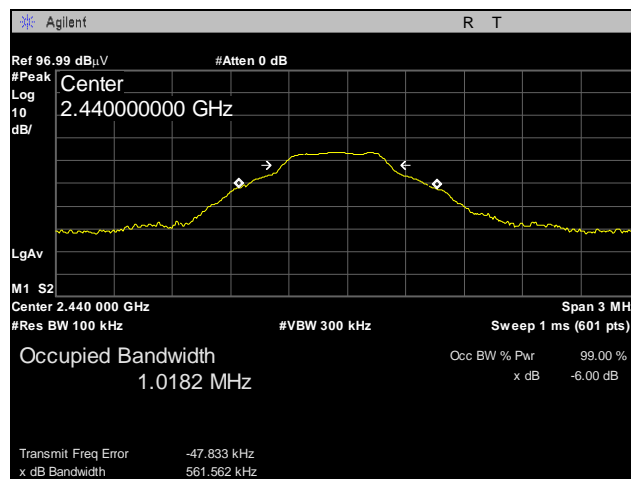
Occupied Bandwidth		
Carrier Channel	Frequency (MHz)	Measured 6 dB Bandwidth (kHz)
Low	2402	552.415
Mid	2440	561.562
High	2480	556.690

Table 7. 6 dB Occupied Bandwidth, Test Results

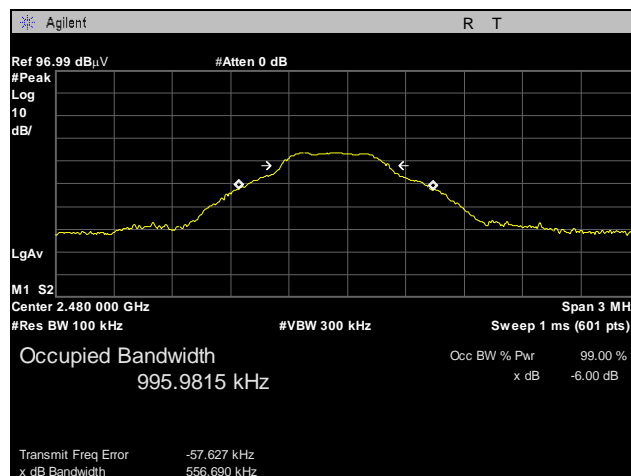
6 dB Occupied Bandwidth Test Results



Plot 1. 6 dB Occupied Bandwidth, Low Channel



Plot 2. 6 dB Occupied Bandwidth, Mid Channel



Plot 3. 6 dB Occupied Bandwidth, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(b) Peak Power Output

Test Requirements: §15.247(b): The maximum peak output power of the intentional radiator shall not exceed the following:

Digital Transmission Systems (MHz)	Output Limit (Watts)
902-928	1.000
2400-2483.5	1.000
5725- 5850	1.000

Table 8. Output Power Requirements from §15.247(b)

§15.247(c): if transmitting antennas of directional gain greater than 6 dBi are used the peak output power from the intentional radiator shall be reduced below the stated values in the Table 8, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

Systems operating in the 2400 – 2483.5 MHz band and using a point to point application may employ transmitting antennas with directional gain greater than 6 dBi provided the maximum peak output power of the intentional radiator is reduced by 1 dB for every 3 dB that the directional gain of the antenna exceeds 6 dBi.

Systems operating in the 5725 – 5850 MHz band that are used exclusively for fixed, point-to-point operations may employ transmitting antennas with directional gain greater than 6 dBi without any corresponding reduction in transmitter peak output power.

Fixed, point-to-point operation excludes the use of point-to-multipoint systems, Omni-directional applications, and multiple co-located intentional radiators transmitting the same information. The operator of the spread spectrum intentional radiator or, if the equipment is professionally installed, the installer is responsible for ensuring that the system is used exclusively for fixed, point-to-point operations. The instruction manual furnished with the intentional radiator shall contain language in the installation instructions informing the operator and the installer of this responsibility.

Test Procedure: The transmitter was connected to a calibrated spectrum analyzer. The EUT was measured at the low, mid and high channels of each band at the maximum power level. The device did not have a conducted port so the testing was done radiated.

Test Results: The EUT was compliant with the Peak Power Output limits of §15.247(b).

Test Engineer(s): Ajaz Khan

Test Date(s): 05/27/16

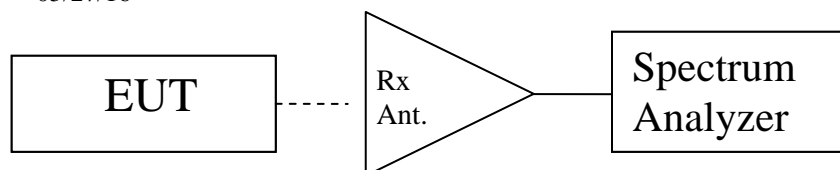


Figure 2. Peak Power Output Test Setup

Peak Power Output Test Results

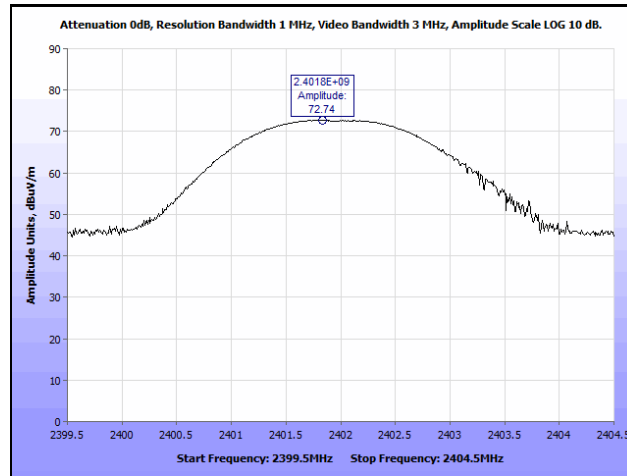
Carrier Channel	Frequency (MHz)	Measured Peak Field Strength (dBuV/m)	Measured Peak Output Power (dBm)	Margin (dB)
Low	2402	72.74	-31.05	-61.05
Mid	2440	69.99	-33.8	-63.8
High	2480	69.8	-33.99	-63.99

Table 9. Peak Power Output, Test Results

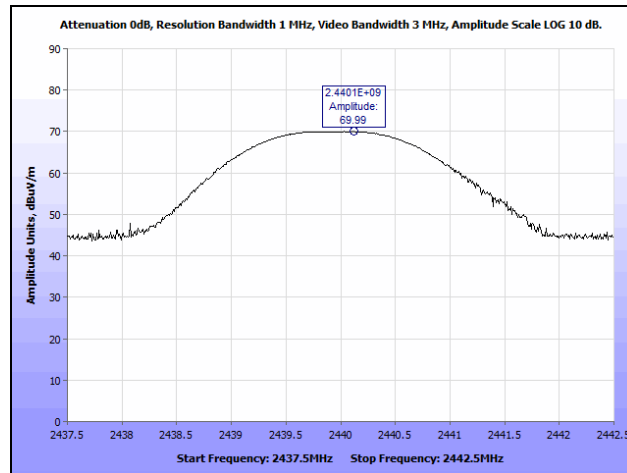
Note: The following equation was used to convert field strength (dBuV/m) to EIRP (dBm). The device was tested at 1m.

$$\text{EIRP} = \text{E0} + 20 \log(d) + \text{Antenna Gain (1dBi)} - 104.8$$

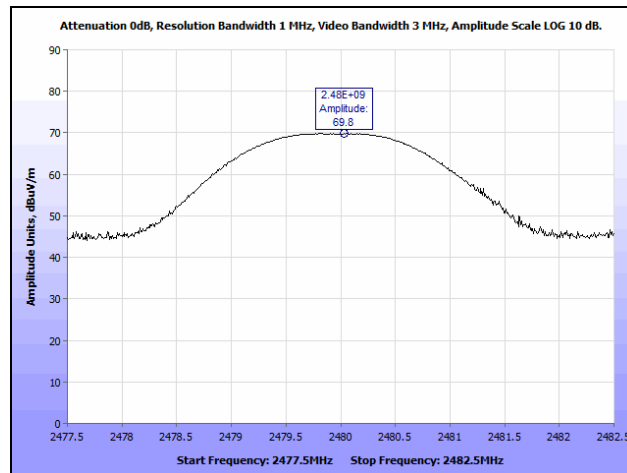
Peak Power Output Test Results



Plot 4. Peak Power Output, Low Channel



Plot 5. Peak Power Output, Mid Channel



Plot 6. Peak Power Output, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(d) Radiated Spurious Emissions Requirements and Band Edge

Test Requirements: §15.247(d); §15.205: Emissions outside the frequency band.

§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. 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 § 15.209(a).

§15.205(a): Except as shown in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090–0.110-----	16.42–16.423	399.9–410	4.5–5.15
¹ 0.495–0.505-----	16.69475–16.69525	608–614	5.35–5.46
2.1735–2.1905-----	16.80425–16.80475	960–1240	7.25–7.75
4.125–4.128-----	25.5–25.67	1300–1427	8.025–8.5
4.17725–4.17775-----	37.5–38.25	1435–1626.5	9.0–9.2
4.20725–4.20775-----	73–74.6	1645.5–1646.5	9.3–9.5
6.215–6.218-----	74.8–75.2	1660–1710	10.6–12.7
6.26775–6.26825-----	108–121.94	1718.8–1722.2	13.25–13.4
6.31175–6.31225-----	123–138	2200–2300	14.47–14.5
8.291–8.294-----	149.9–150.05	2310–2390	15.35–16.2
8.362–8.366-----	156.52475–156.52525	2483.5–2500	17.7–21.4
8.37625–8.38675-----	156.7–156.9	2655–2900	22.01–23.12
8.41425–8.41475-----	162.0125–167.17	3260–3267	23.6–24.0
12.29–12.293-----	167.72–173.2	3332–3339	31.2–31.8
12.51975–12.52025-----	240–285	3345.8–3358 36.	43–36.5
12.57675–12.57725-----	322–335.4	3600–4400	(²)

Table 10. Restricted Bands of Operation

¹ Until February 1, 1999, this restricted band shall be 0.490 – 0.510 MHz.

² Above 38.6

Test Requirement(s): § 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 Table 11.

Frequency (MHz)	§ 15.209(a), Radiated Emission Limits (dBµV) @ 3m
30 - 88	40.00
88 - 216	43.50
216 - 960	46.00
Above 960	54.00

Table 11. Radiated Emissions Limits Calculated from FCC Part 15, § 15.209 (a)

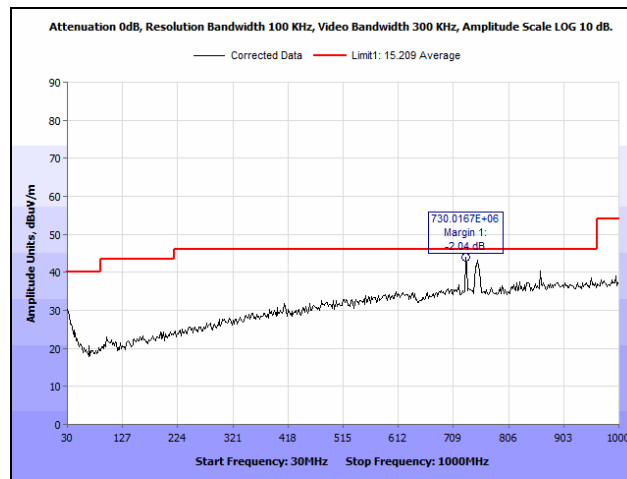
Test Procedures: The transmitter was turned on. Measurements were performed of the low, mid and high Channels. The EUT was rotated orthogonally through all three axes. Plots shown are corrected for both antenna correction factor and distance and compared to a 3 m limit line. Only noise floor was measured above 18 GHz. The fundamental was not notched out.

Test Results: The EUT was compliant with the Radiated Spurious Emission limits of § 15.247(d).

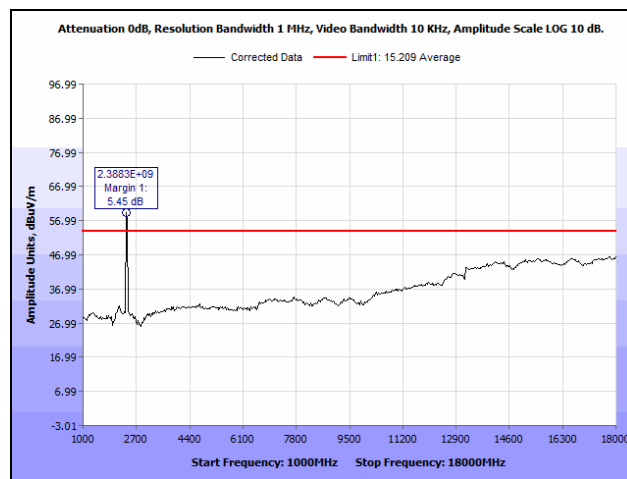
Test Engineer(s): Ajaz Khan

Test Date(s): 05/27/16

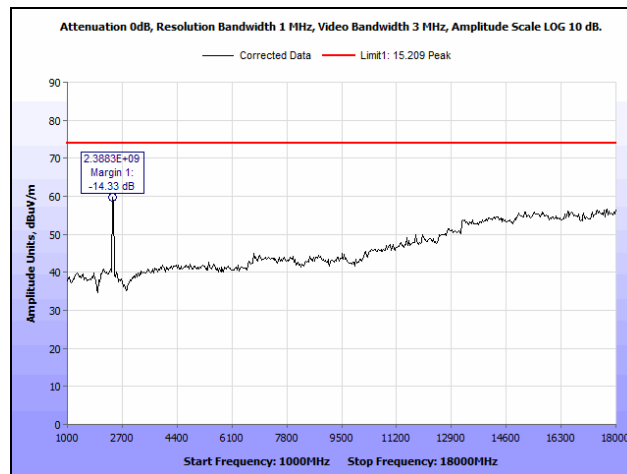
Radiated Spurious Emissions Test Results



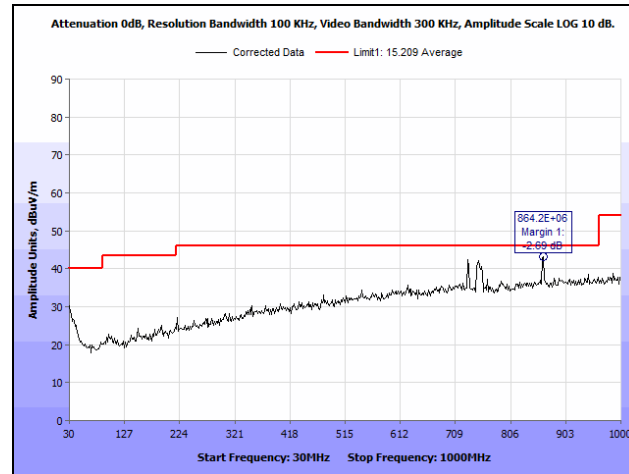
Plot 7. Radiated Spurious Emissions, Low Channel, 30 MHz – 1 GHz



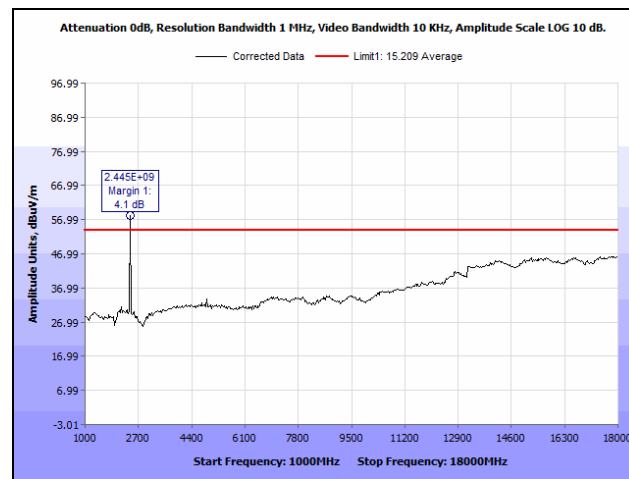
Plot 8. Radiated Spurious Emissions, Low Channel, 1 GHz – 18 GHz, Average



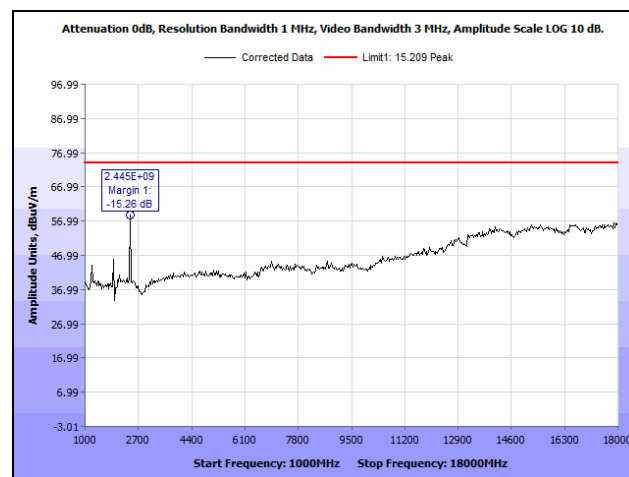
Plot 9. Radiated Spurious Emissions, Low Channel, 1 GHz – 18 GHz, Peak



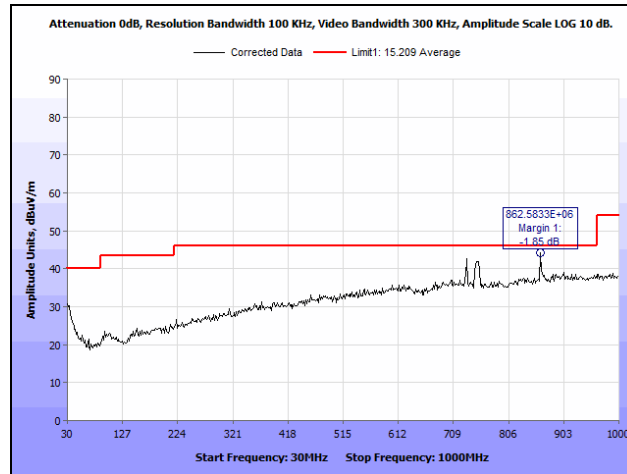
Plot 10. Radiated Spurious Emissions, Mid Channel, 30 MHz – 1 GHz



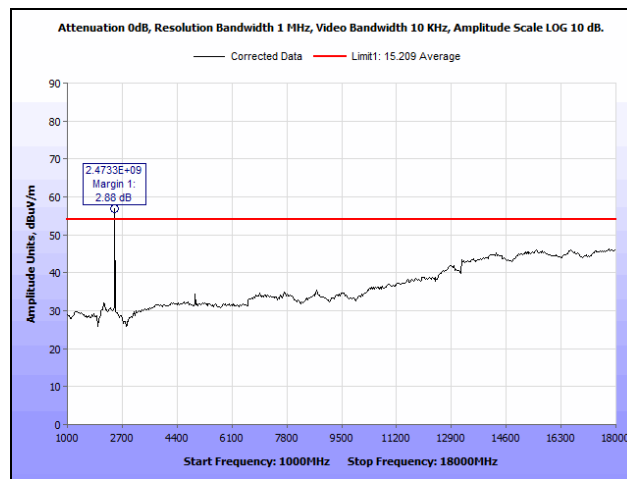
Plot 11. Radiated Spurious Emissions, Mid Channel, 1 GHz – 18 GHz, Average



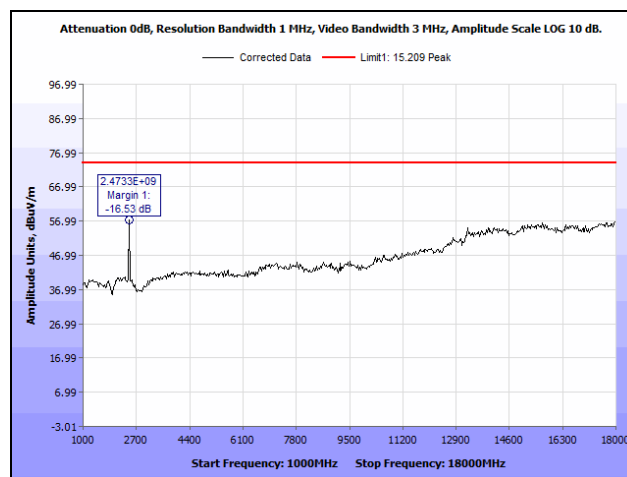
Plot 12. Radiated Spurious Emissions, Mid Channel, 1 GHz – 18 GHz, Peak



Plot 13. Radiated Spurious Emissions, High Channel, 30 MHz – 1 GHz



Plot 14. Radiated Spurious Emissions, High Channel, 1 GHz – 18 GHz, Average

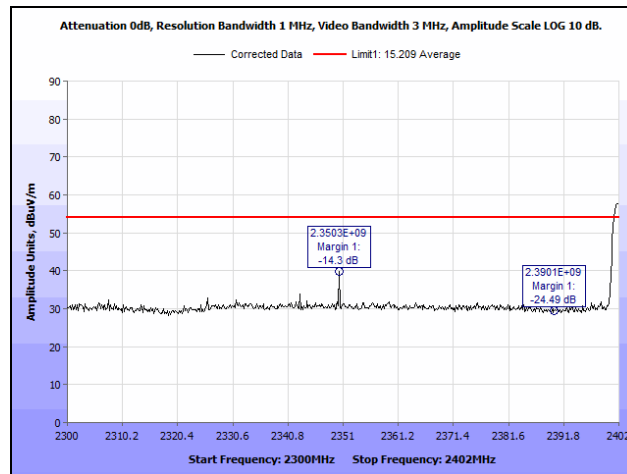


Plot 15. Radiated Spurious Emissions, High Channel, 1 GHz – 18 GHz, Peak

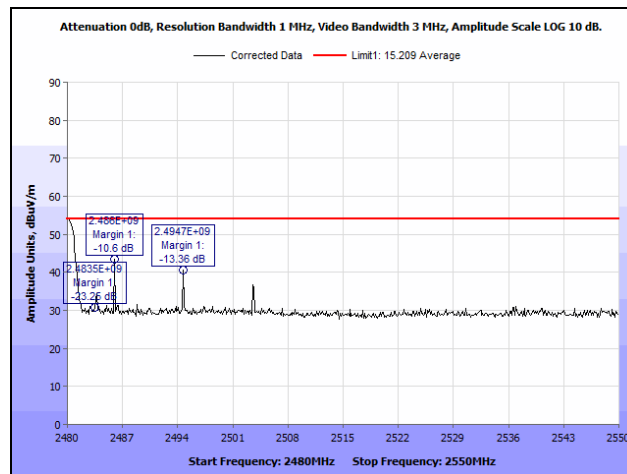
Radiated Band Edge Measurements

Test Procedures:

The transmitter was turned on. Measurements were performed of the low, mid and high Channels. The EUT was rotated orthogonally through all three axes. Plots shown are corrected for both antenna correction factor and distance and compared to a 3 m limit line.

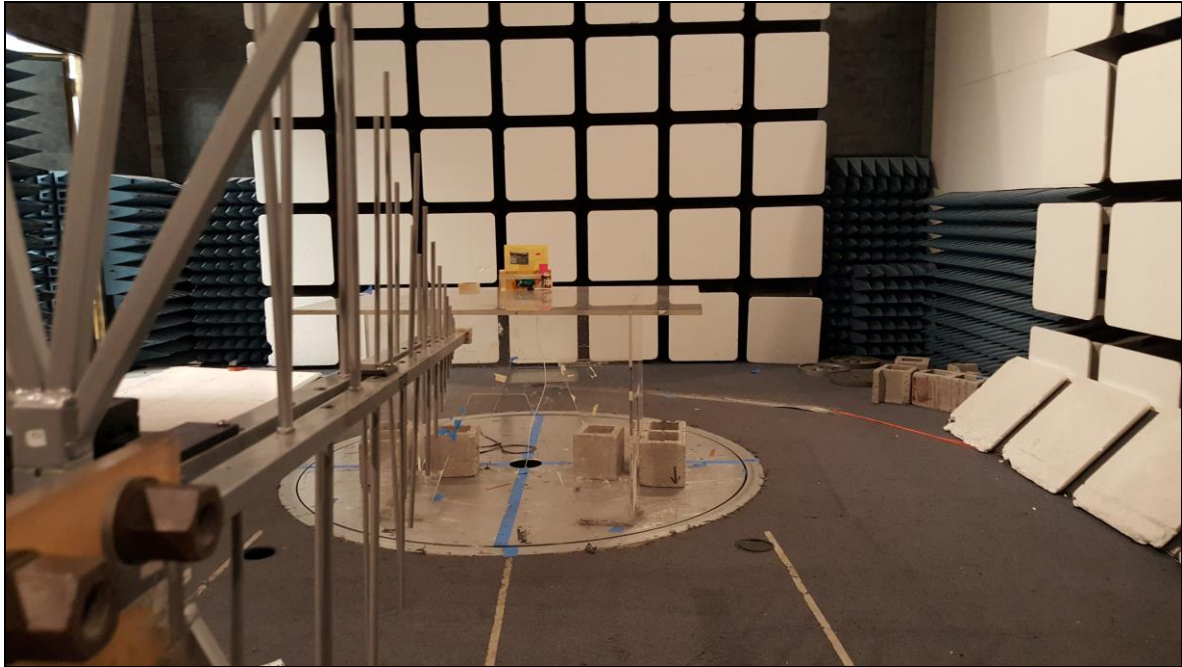


Plot 16. Radiated Restricted Band Edge, Low Channel, Peak vs. Average

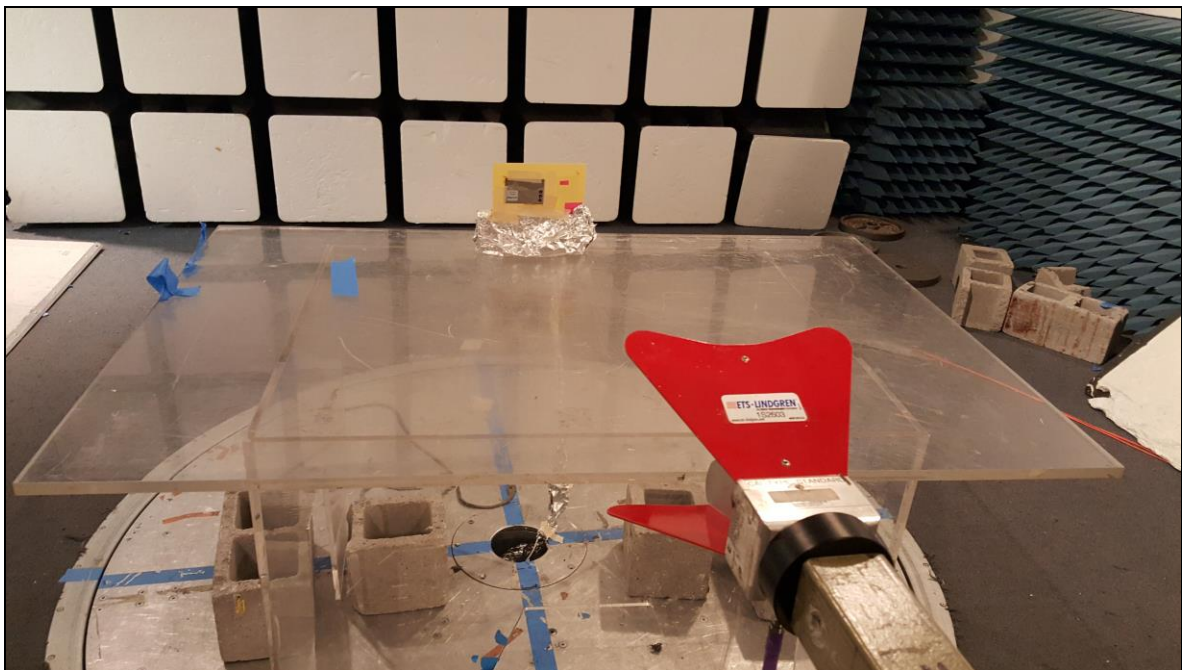


Plot 17. Radiated Restricted Band Edge, High Channel, Peak vs. Average

Radiated Spurious Emissions Test Setup



Photograph 1. Radiated Spurious Emissions, Test Setup, 30 MHz – 1 GHz



Photograph 2. Radiated Spurious Emissions, Test Setup, 1 GHz – 18 GHz

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(d) RF Spurious Emissions Requirements and Band Edge

Test Requirement: **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.

Test Procedure: For intentional radiators with a digital device portion which operates below 10 GHz, the spectrum was investigated as per §15.33(a)(1) and §15.33(a)(4); i.e., the lowest RF signal generated or used in the device up to the 10th harmonic of the highest fundamental frequency or to 40 GHz, whichever is lower.

Since the EUT had an integral antenna, conducted measurements could not be performed. Measurements needed to be taken radiated. An antenna was located 3 m away from the EUT and plots were taken. The EUT was rotated through all three orthogonal axes. The plots were corrected for both antenna correction factor and cable loss.

See following pages for detailed test results with RF Conducted Spurious Emissions.

Test Results: The EUT was compliant with the Conducted Spurious Emission limits of §15.247(d).

Test Engineer(s): Ajaz Khan

Test Date(s): 05/27/16

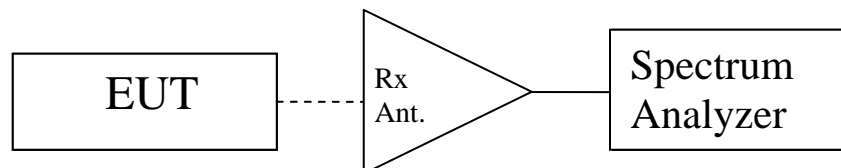
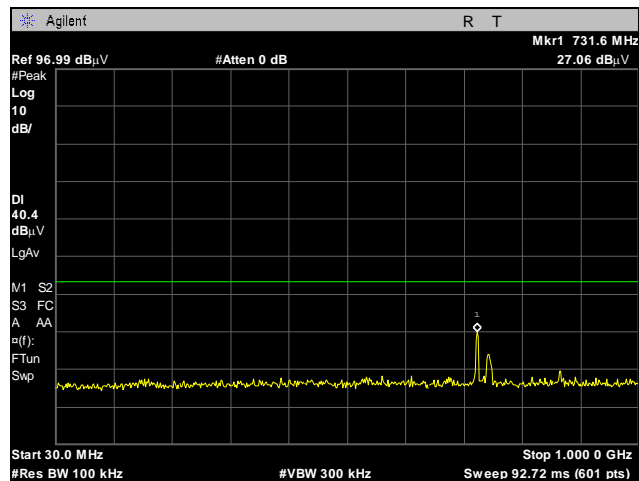
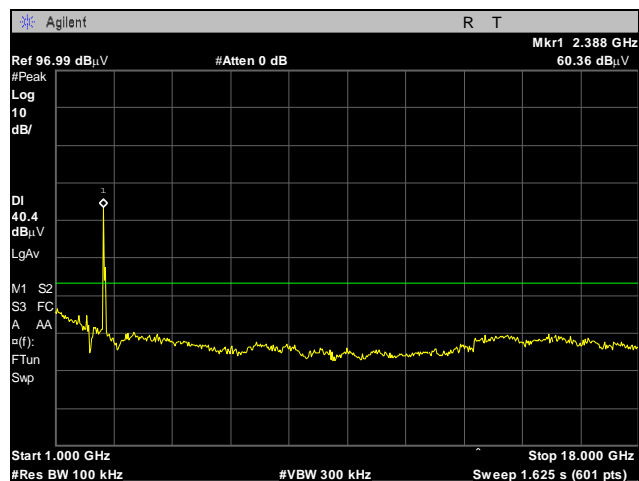


Figure 3. Block Diagram, Spurious Emissions Test Setup

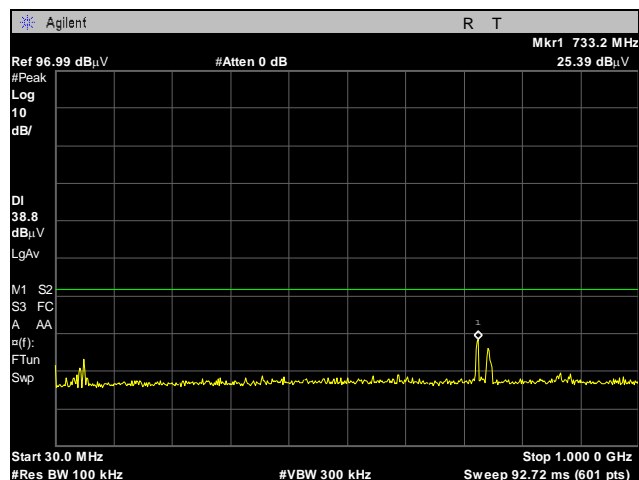
Spurious Emissions Test Results



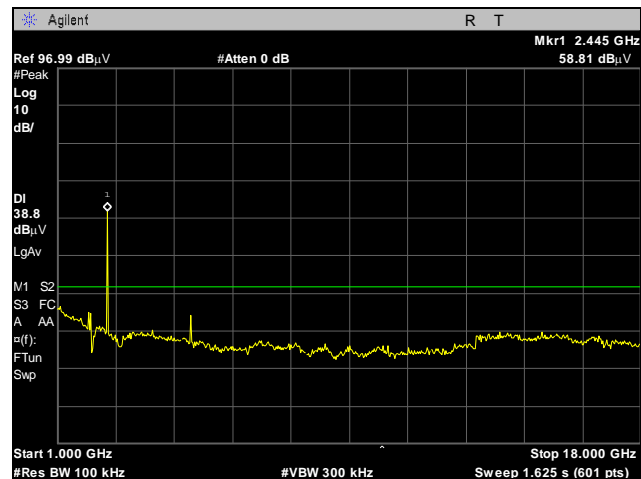
Plot 18. Spurious Emissions, Low Channel, 30 MHz – 1 GHz



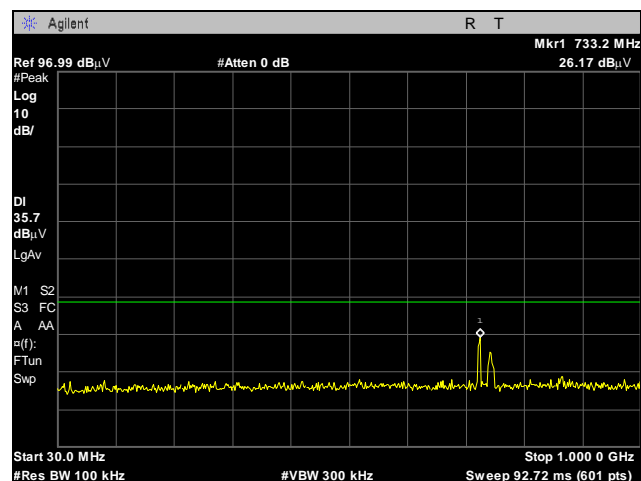
Plot 19. Spurious Emissions, Low Channel, 1 GHz – 18 GHz



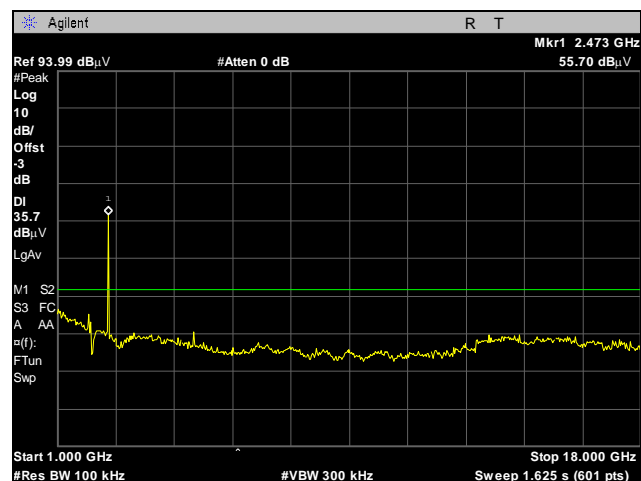
Plot 20. Spurious Emissions, Mid Channel, 30 MHz – 1 GHz



Plot 21. Spurious Emissions, Mid Channel, 1 GHz – 18 GHz

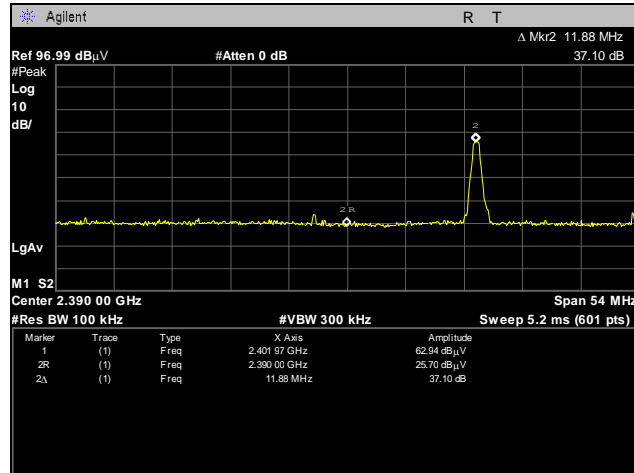


Plot 22. Spurious Emissions, High Channel, 30 MHz – 1 GHz

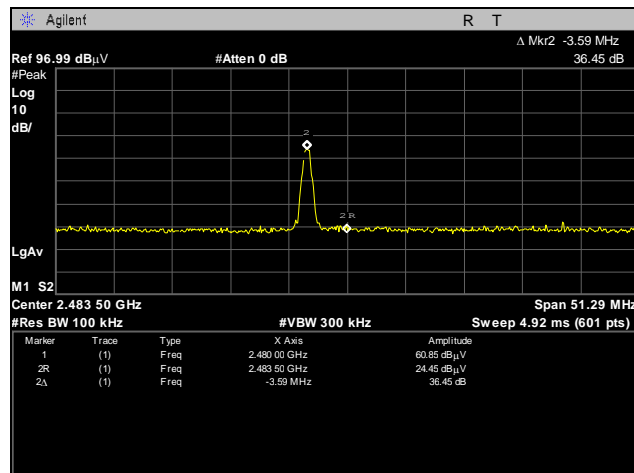


Plot 23. Spurious Emissions, High Channel, 1 GHz – 18 GHz

Band Edge Test Results



Plot 24. Band Edge, Low Channel



Plot 25. Band Edge, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(e) Peak Power Spectral Density

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

Test Procedure: The device did not have a conducted port so the testing was done radiated. The power level was set to the maximum level throughout each of the 100 sweeps of power averaging. The RBW was set to 3 kHz and a VBW set to 9 kHz or greater. The spectrum analyzer was set to an auto sweep time and a peak detector was used. Measurements were carried out at the low, mid and high channels.

Test Results: The EUT was compliant with the peak power spectral density limits of § 15.247 (e).
The peak power spectral density was determined from plots on the following page(s).

Test Engineer: Ajaz Khan

Test Date: 05/27/16

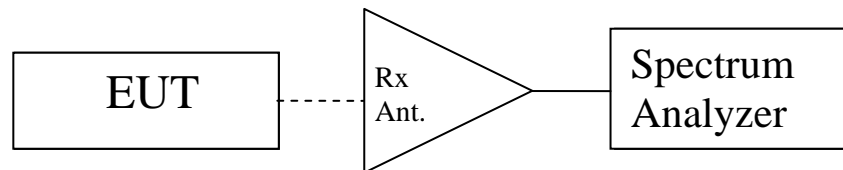


Figure 4. Block Diagram, Peak Power Spectral Density Test Setup

Peak Power Spectral Density Test Results

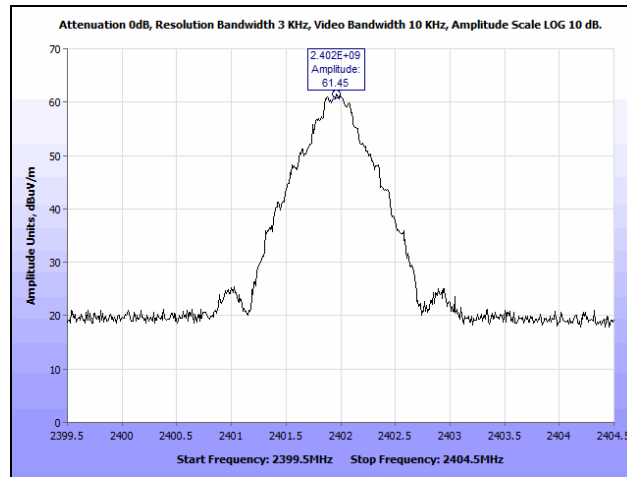
Carrier Channel	Frequency (MHz)	Measured PPSD (dBuV/m)	Measured PPSD (dBm)	Limit (dBm)	Margin (dB)
Low	2402	61.45	-42.34	8	-50.34
Mid	2440	58.74	-45.05	8	-53.05
High	2480	59.3	-44.49	8	-52.49

Table 12. Peak Power Spectral Density, Test Results

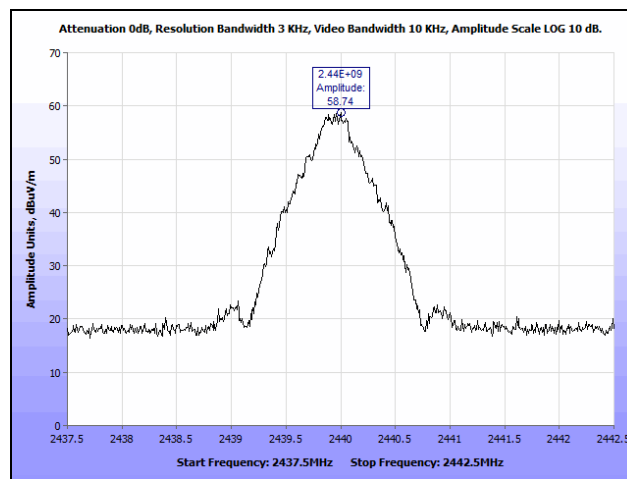
Note: The following equation was used to convert field strength (dBμV/m) to EIRP (dBm). The device was tested at 1m.

$$\text{EIRP} = \text{E0} + 20 \log(d) + \text{Antenna Gain (1dBi)} - 104.8$$

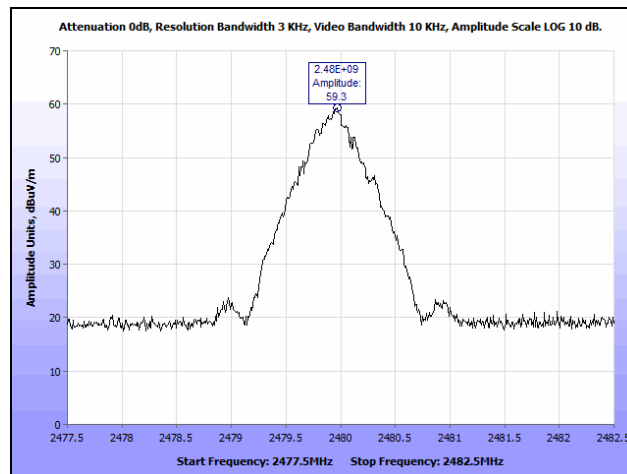
Peak Power Spectral Density



Plot 26. Peak Power Spectral Density, Low Channel



Plot 27. Peak Power Spectral Density, Mid Channel



Plot 28. Peak Power Spectral Density, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(i) RF Exposure (SAR Exemption)

RF Exposure Requirements: §1.1307(b)(1) and §1.1307(b)(2): 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 levels in excess of the Commission's guidelines.

RF Radiation Exposure Limit: §1.1310: As specified in this section, the Maximum Permissible Exposure (MPE) Limit shall be used to evaluate the environmental impact of human exposure to radiofrequency (RF) radiation as specified in Sec. 1.1307(b), except in the case of portable devices which shall be evaluated according to the provisions of Sec. 2.1093 of this chapter.

SAR Exclusion: **KDB 447498 4.3.1(a):** For 100 MHz to 6 GHz and test separation distances ≤ 50 mm, the 1-g and 10-g SAR test exclusion thresholds are determined by the following: $[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}] \leq 3.0$ for 1-g SAR, and ≤ 7.5 for 10-g extremity SAR, where $f(\text{GHz})$ is the RF channel transmit frequency in GHz. 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 4.1 f) is applied to determine SAR test exclusion.

Test Results: Since the device is a handheld device, the SAR exclusion criterion was evaluated.

EUT's operating frequencies @ 2400-2483.5 MHz.

Equation from page 12 of KDB 447498 4.3.1(a) in order for the device to be exempt from SAR,

$$(\text{Max. Power (mW)} / \text{Min. Test separation distance (mm)}) * \sqrt{\text{Frequency (GHz)}} \leq 3$$

Max Output Power was -31.05 dBm (0.00078 mW) at 2.402 GHz.

$$(0.00078 \text{ mW} / 5 \text{ mm}) * \sqrt{2.402 \text{ GHz}} \leq 3$$
$$0.00024 \leq 3$$

Based on this calculation the device is exempt from SAR testing.

IV. Test Equipment

Test Equipment

Calibrated test equipment utilized during testing was maintained in a current state of calibration per the requirements of ISO/IEC 17025:2005.

Asset	Equipment	Manufacturer	Model	Calibration Date	Calibration Due Date
1S2399	TURNTABLE CONTROLLER	SUNOL SCIENCE	SC99V	NOT REQUIRED	
1S2421	EMI TEST RECEIVER	ROHDE & SCHWARZ	ESIB7	12/31/2015	12/31/2016
1S2482	5 METER CHAMBER (NSA)	PANASHIELD	5 METER SEMI-ANECHOIC CHAMBER	3/12/2015	9/12/2016
1S3826	DRG HORN ANTENNA	ETS-LINDGREN	3117	4/22/2015	4/22/2017
1S2600	BILOG ANTENNA	TESEQ	CBL6112D	10/5/2015	10/5/2016
1S3835	PSA SPECTRUM ANALYZER	AGILENT TECHNOLOGIES	E4448A	11/20/2015	11/20/2017
1S2121	PRE-AMPLIFIER	HEWLETT PACKARD	8449B	SEE NOTE	
1S2229	TEMPERATURE CHAMBER	TENNY ENGINEERING	T63C	5/4/2015	11/4/2016

Table 13. Test Equipment List

Note: Functionally tested equipment is verified using calibrated instrumentation at the time of testing.

V. Certification & User's Manual Information

Certification & User's Manual Information

A. Certification Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 2, Subpart I — Marketing of Radio frequency devices:

§ 2.801 Radio-frequency device defined.

As used in this part, a radio-frequency device is any device which in its operation is capable of Emitting radio-frequency energy by radiation, conduction, or other means. Radio- frequency devices include, but are not limited to:

- (a) The various types of radio communication transmitting devices described throughout this chapter.
- (b) *The incidental, unintentional and intentional radiators defined in Part 15 of this chapter.*
- (c) The industrial, scientific, and medical equipment described in Part 18 of this chapter.
- (d) Any part or component thereof which in use emits radio-frequency energy by radiation, conduction, or other means.

§ 2.803 Marketing of radio frequency devices prior to equipment authorization.

- (a) Except as provided elsewhere in this chapter, no person shall sell or lease, or offer for sale or lease (including advertising for sale or lease), or import, ship or distribute for the purpose of selling or leasing or offering for sale or lease, any radio frequency device unless:
 - (1) In the case of a device subject to certification, such device has been authorized by the Commission in accordance with the rules in this chapter and is properly identified and labeled as required by §2.925 and other relevant sections in this chapter; or
 - (2) In the case of a device that is not required to have a grant of equipment authorization issued by the Commission, but which must comply with the specified technical standards prior to use, such device also complies with all applicable administrative (including verification of the equipment or authorization under a Declaration of Conformity, where required), technical, labeling and identification requirements specified in this chapter.
- (d) Notwithstanding the provisions of paragraph (a) of this section, the offer for sale solely to business, commercial, industrial, scientific or medical users (but not an offer for sale to other parties or to end users located in a residential environment) of a radio frequency device that is in the conceptual, developmental, design or pre-production stage is permitted prior to equipment authorization or, for devices not subject to the equipment authorization requirements, prior to a determination of compliance with the applicable technical requirements *provided* that the prospective buyer is advised in writing at the time of the offer for sale that the equipment is subject to the FCC rules and that the equipment will comply with the appropriate rules before delivery to the buyer or to centers of distribution.

- (e)(1) Notwithstanding the provisions of paragraph (a) of this section, prior to equipment authorization or determination of compliance with the applicable technical requirements any radio frequency device may be operated, but not marketed, for the following purposes and under the following conditions:
- (i) *Compliance testing;*
 - (ii) Demonstrations at a trade show provided the notice contained in paragraph (c) of this section is displayed in a conspicuous location on, or immediately adjacent to, the device;
 - (iii) Demonstrations at an exhibition conducted at a business, commercial, industrial, scientific or medical location, but excluding locations in a residential environment, provided the notice contained in paragraphs (c) or (d) of this section, as appropriate, is displayed in a conspicuous location on, or immediately adjacent to, the device;
 - (iv) Evaluation of product performance and determination of customer acceptability, provided such operation takes place at the manufacturer's facilities during developmental, design or pre-production states; or
 - (v) Evaluation of product performance and determination of customer acceptability where customer acceptability of a radio frequency device cannot be determined at the manufacturer's facilities because of size or unique capability of the device, provided the device is operated at a business, commercial, industrial, scientific or medical user's site, but not at a residential site, during the development, design or pre-production stages.
- (e)(2) For the purpose of paragraphs (e)(1)(iv) and (e)(1)(v) of this section, the term *manufacturer's facilities* includes the facilities of the party responsible for compliance with the regulations and the manufacturer's premises, as well as the facilities of other entities working under the authorization of the responsible party in connection with the development and manufacture, but not the marketing, of the equipment.
- (f) For radio frequency devices subject to verification and sold solely to business, commercial, industrial, scientific and medical users (excluding products sold to other parties or for operation in a residential environment), parties responsible for verification of the devices shall have the option of ensuring compliance with the applicable technical specifications of this chapter at each end user's location after installation, provided that the purchase or lease agreement includes a proviso that such a determination of compliance be made and is the responsibility of the party responsible for verification of the equipment.

Certification & User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 2, Subpart J — Equipment Authorization Procedures:

§ 2.901 Basis and Purpose

- (a) In order to carry out its responsibilities under the Communications Act and the various treaties and international regulations, and in order to promote efficient use of the radio spectrum, the Commission has developed technical standards for radio frequency equipment and parts or components thereof. The technical standards applicable to individual types of equipment are found in that part of the rules governing the service wherein the equipment is to be operated.¹ *In addition to the technical standards provided, the rules governing the service may require that such equipment be verified by the manufacturer or importer, be authorized under a Declaration of Conformity, or receive an equipment authorization from the Commission by one of the following procedures: certification or registration.*
- (b) The following sections describe the verification procedure, the procedure for a Declaration of Conformity, and the procedures to be followed in obtaining certification from the Commission and the conditions attendant to such a grant.

§ 2.907 Certification.

- (a) Certification is an equipment authorization issued by the Commission, based on representation and test data submitted by the applicant.
- (b) Certification attaches to all units subsequently marketed by the grantee which are identical (see Section 2.908) to the sample tested except for permissive changes or other variations authorized by the Commission pursuant to Section 2.1043.

¹ In this case, the equipment is subject to the rules of Part 15. More specifically, the equipment falls under Subpart B (of Part 15), which deals with unintentional radiators.

Certification & User's Manual Information

§ 2.948 Description of measurement facilities.

- (a) Each party making measurements of equipment that is subject to an equipment authorization under Part 15 or Part 18 of this chapter, regardless of whether the measurements are filed with the Commission or kept on file by the party responsible for compliance of equipment marketed within the U.S. or its possessions, shall compile a description of the measurement facilities employed.
 - (1) If the measured equipment is subject to the verification procedure, the description of the measurement facilities shall be retained by the party responsible for verification of the equipment.
 - (i) *If the equipment is verified through measurements performed by an independent laboratory, it is acceptable for the party responsible for verification of the equipment to rely upon the description of the measurement facilities retained by or placed on file with the Commission by that laboratory. In this situation, the party responsible for the verification of the equipment is not required to retain a duplicate copy of the description of the measurement facilities.*
 - (ii) If the equipment is verified based on measurements performed at the installation site of the equipment, no specific site calibration data is required. It is acceptable to retain the description of the measurement facilities at the site at which the measurements were performed.
 - (2) If the equipment is to be authorized by the Commission under the certification procedure, the description of the measurement facilities shall be filed with the Commission's Laboratory in Columbia, Maryland. The data describing the measurement facilities need only be filed once but must be updated as changes are made to the measurement facilities or as otherwise described in this section. At least every three years, the organization responsible for filing the data with the Commission shall certify that the data on file is current.

Certification & User's Manual Information

1. Label and User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 15, Subpart A — General:

§ 15.19 Labeling requirements.

(a) *In addition to the requirements in Part 2 of this chapter, a device subject to certification or verification shall be labeled as follows:*

- (1) Receivers associated with the operation of a licensed radio service, e.g., FM broadcast under Part 73 of this chapter, land mobile operation under Part 90, etc., 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 condition that this device does not cause harmful interference.

- (2) A stand-alone cable input selector switch, shall bear the following statement in a conspicuous location on the device:

This device is verified to comply with Part 15 of the FCC Rules for use with cable television service.

- (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 under paragraph (a) of this section is required to be affixed only to the main control unit.
- (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.

§ 15.21 Information to user.

The user's manual or instruction manual for an intentional or unintentional radiator shall caution the user that changes or modifications not expressly approved by the party responsible for compliance could void the user's authority to operate the equipment.

Verification & User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 15, Subpart B — Unintentional Radiators:

§ 15.105 Information to the user.

- (a) For a Class A digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

Note: This equipment has been tested and found to comply with the limits for a Class A digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a commercial environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. Operation of this equipment in a residential area is likely to cause harmful interference in which case the user will be required to correct the interference at own expense.

- (b) For a Class B digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

Note: This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a residential environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:

- Reorient or relocate the receiving antenna.
- Increase the separation between the equipment and receiver.
- Connect the equipment into an outlet on a circuit different from that to which the receiver is connected.
- Consult the dealer or an experienced radio/TV technician for help.

End of Report