

# FCC Part 15C **Measurement and Test Report**

### For

### Dastmalchi LLC

4490 Von Karman Avenue, Suite 150, Newport Beach, 92660

FCC ID: 2AKAX-COMMUTERO1

FCC Rule(s): FCC Part 15.247

**Product Description:** Commuter

**Tested Model:** Commuter

Report No.: STR18078192I

Sample Receipt Date: 2018-07-18

**Tested Date:** 2018-07-19 to 2018-07-30

**Issued Date:** 2018-07-30

**Tested By:** Long Tang / Engineer

Silin Chen / EMC Manager Reviewed By:

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Note: This test report is limited to the above client company and the product model only. It may not be duplicated without prior permitted by Shenzhen SEM Test Technology Co., Ltd.



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### 1. GENERAL INFORMATION

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

### **Client Information**

Applicant: Dastmalchi LLC

Address of applicant: 4490 Von Karman Avenue, Suite 150, Newport Beach, 92660

Manufacturer: Shenzhen Trendwoo Tech. Co., Ltd

Address of manufacturer: 12th Floor, Block B, Building 6, BaoNeng Tech Park, No.1

Qingxiang Road, Longhua District, Shenzhen, China

General Description of El	T
Product Name:	Commuter
Brand Name:	KOVE
Model No.:	Commuter
Adding Model(s):	/
Rated Voltage:	Battery:DC7.4V
Battery Capacity:	2000mAh
Power Adapter:	/
Note: The test data is gathered	from a production sample, provided by the manufacturer.

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Technical Characteristics of EUT			
Bluetooth Version:	V4.2 (BDR/EDR mode)		
Frequency Range:	2402-2480MHz		
RF Output Power:	-3.217dBm (Conducted)		
Data Rate:	1Mbps, 2Mbps, 3Mbps		
Modulation:	GFSK, Pi/4 QDPSK, 8DPSK		
Quantity of Channels:	79		
Channel Separation:	1MHz		
Type of Antenna:	PCB		
Antenna Gain:	1.9dBi		
Lowest Internal Frequency of EUT:	12MHz		

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#### 1.2 Test Standards

The tests were performed according to following standards:

<u>FCC Rules Part 15.247:</u> Frequency Hopping, Direct Spread Spectrum and Hybrid Systems that are in operation within the bands of 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz.

ANSI C63.10-2013: American National Standard for Testing Unlicensed Wireless Devices.

**Maintenance of compliance** is the responsibility of the manufacturer. Any modification of the product, which result in lowering the emission, should be checked to ensure compliance has been maintained.

### 1.3 Test Methodology

All measurements contained in this report were conducted with ANSI C63.10-2013,

The equipment under test (EUT) was configured to measure its highest possible emission level. The test modes were adapted accordingly in reference to the Operating Instructions.

#### 1.4 Test Facility

#### FCC - Registration No.: 125990

Shenzhen SEM Test Technology Co., Ltd. Laboratory has been recognized to perform compliance testing on equipment subject to the Commissions Declaration Of Conformity (DOC). The Designation Number is CN5010, and Test Firm Registration Number is 125990.

#### Industry Canada (IC) Registration No.: 11464A

The 3m Semi-anechoic chamber of Shenzhen SEM.Test Technology Co., Ltd. has been registered by Certification and Engineering Bureau of Industry Canada for radio equipment testing with Registration No.: 11464A.

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### 1.5 EUT Setup and Test Mode

The EUT was operated in the engineering mode to fix the Tx frequency that was for the purpose of the measurements. All testing shall be performed under maximum output power condition, and to measure its highest possible emissions level, more detailed description as follows:

Test Mode List				
Test Mode	Description	Remark		
TM1	Low Channel	2402MHz		
TM2	Middle Channel	2441MHz		
TM3	High Channel	2480MHz		
TM4	Hopping	2402-2480MHz		

Modulation Configure				
Modulation	Packet	Packet Type	Packet Size	
	DH1	4	27	
GFSK	DH3	11	183	
	DH5	15	339	
	2DH1	20	54	
Pi/4 DQPSK	2DH3	26	367	
	2DH5	30	679	
	3DH1	24	83	
8DPSK	3DH3	27	552	
	3DH5	31	1021	

Normal mode: the Bluetooth has been tested on the modulation of GFSK, (Pi/4)DQPSK and 8DPSK, compliance test and record the worst case.

Test Conditions				
Temperature:	22~25 °C			
Relative humidity	50~55 %.			
ATM Pressure:	1019 mbar			

EUT Cable List and Details				
Cable Description Length (m) Shielded/Unshielded With / Without Ferrite				
/	/	/	/	

Special Cable List and Details				
Cable Description	Length (m)	Shielded/Unshielded	With / Without Ferrite	
USB LINE	0.8	Unshielded	Without Core	

Auxiliary Equipment List and Details			
Description	Manufacturer	Model	Serial Number
AC ADAPTER	KEZHEN	KZ0501500V	/

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# 1.6 Measurement Uncertainty

Measurement uncertainty				
Parameter	Conditions	Uncertainty		
RF Output Power	Conducted	±0.42dB		
Occupied Bandwidth	Conducted	±1.5%		
Conducted Spurious Emission	Conducted	±2.17dB		
Conducted Emissions	Conducted	9-150kHz ±3.74dB		
Conducted Emissions	Conducted	$0.15-30 \text{MHz} \pm 3.34 \text{dB}$		
		30-200MHz ±4.52dB		
Transmitter Spurious Emissions	Radiated	0.2-1GHz ±5.56dB		
		1-6GHz ±3.84dB		
		6-18GHz ±3.92dB		



# 1.7 Test Equipment List and Details

No.	Description	Manufacturer	Model	Serial No.	Cal Date	<b>Due Date</b>
SEMT-1072	Spectrum Analyzer	Agilent	E4407B	MY41440400	2018-05-22	2019-05-21
SEMT-1031	Spectrum Analyzer	Rohde & Schwarz	FSP30	836079/035	2018-05-22	2019-05-21
SEMT-1007	EMI Test Receiver	Rohde & Schwarz	ESVB	825471/005	2018-05-22	2019-05-21
SEMT-1008	Amplifier	Agilent	8447F	3113A06717	2018-05-22	2019-05-21
SEMT-1043	Amplifier	C&D	PAP-1G18	2002	2018-05-22	2019-05-21
SEMT-1011	Broadband Antenna	Schwarz beck	VULB9163	9163-333	2017-06-08	2020-06-07
SEMT-1042	Horn Antenna	ETS	3117	00086197	2017-06-08	2020-06-07
SEMT-1121	Horn Antenna	Schwarzbeck	BBHA 9170	BBHA9170582	2017-06-08	2020-06-07
SEMT-1069	Loop Antenna	Schwarz beck	FMZB 1516	9773	2017-06-08	2020-06-07
SEMT-1001	EMI Test Receiver	Rohde & Schwarz	ESPI	101611	2018-05-22	2019-05-21
SEMT-1003	L.I.S.N	Schwarz beck	NSLK8126	8126-224	2018-05-22	2019-05-21
SEMT-1002	Pulse Limiter	Rohde & Schwarz	ESH3-Z2	100911	2018-05-22	2019-05-21
SEMT-1168	Pre-amplifier	Direction Systems Inc.	PAP-0126	14141-12838	2018-05-22	2019-05-21
SEMT-1169	Pre-amplifier	Direction Systems Inc.	PAP-2640	14145-14153	2018-05-22	2019-05-21
SEMT-1163	Spectrum Analyzer	Rohde & Schwarz	FSP40	100612	2018-05-22	2019-05-21
SEMT-1170	DRG Horn Antenna	A.H. SYSTEMS	SAS-574	571	2018-03-19	2021-03-18
SEMT-1166	Power Limiter	Agilent	N9356B	MY45450376	2018-05-22	2019-05-21
SEMT-1048	RF Limiter	ATTEN	AT-BSF-2400~2500	/	2018-05-22	2019-05-21
SEMT-1076	RF Switcher	Top Precision	RCS03-A2	/	2018-05-22	2019-05-21
SEMT-C001	Cable	Zheng DI	LL142-07-07-10M(A)	/	2018-03-19	2019-03-18
SEMT-C002	Cable	Zheng DI	ZT40-2.92J-2.92J-6M	/	2018-03-19	2019-03-18
SEMT-C003	Cable	Zheng DI	ZT40-2.92J-2.92J-2.5M	/	2018-03-19	2019-03-18
SEMT-C004	Cable	Zheng DI	2M0RFC	/	2018-03-19	2019-03-18
SEMT-C005	Cable	Zheng DI	1M0RFC	/	2018-03-19	2019-03-18
SEMT-C006	Cable	Zheng DI	1M0RFC	/	2018-03-19	2019-03-18



# 2. SUMMARY OF TEST RESULTS

FCC Rules	Description of Test Item	Result
§ 2.1093	RF Exposure	Compliant
§ 15.203; § 15.247(b)(4)(i)	Antenna Requirement	Compliant
§15.205	Restricted Band of Operation	Compliant
§ 15.207(a)	Conducted Emission	Compliant
§ 15.209(a)	Radiated Spurious Emissions	Compliant
§ 15.247(a)(1)(iii)	Quantity of Hopping Channel	Compliant
§ 15.247(a)(1)	Channel Separation	Compliant
§ 15.247(a)(1)(iii)	Time of Occupancy (Dwell time)	Compliant
§ 15.247(a)	20dB Bandwidth	Compliant
§ 15.247(b)(1)	RF Power Output	Compliant
§ 15.247(d)	Band Edge (Out of Band Emissions)	Compliant
§ 15.247(a)(1)	Frequency Hopping Sequence	Compliant
§ 15.247(g), (h)	Frequency Hopping System	Compliant

N/A: not applicable

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# 3. RF Exposure

### 3.1 Standard Applicable

According to § 1.1307 and § 2.1093, the portable transmitter must comply the RF exposure requirements.

### 3.2 Test Result

This product complied with the requirement of the RF exposure, please see the RF Exposure Report.



# 4. Antenna Requirement

### **4.1 Standard Applicable**

According to FCC Part 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.

#### **4.2 Evaluation Information**

This product has a PCB antenna, fulfill the requirement of this section.



### 5. Frequency Hopping System Requirements

### 5.1 Standard Applicable

According to FCC Part 15.247(a)(1), The system shall hop to channel frequencies that are selected at the system hopping rate from a pseudo randomly ordered list of hopping frequencies. Each frequency must be used equally on the average by each transmitter. The system receivers shall have input bandwidths that match the hopping channel bandwidths of their corresponding transmitters and shall shift frequencies in synchronization with the transmitted signals.

- (g) Frequency hopping spread spectrum systems are not required to employ all available hopping channels during each transmission. However, the system, consisting of both the transmitter and the receiver, must be designed to comply with all of the regulations in this section should the transmitter be presented with a continuous data (or information) stream. In addition, a system employing short transmission bursts must comply with the definition of a frequency hopping system and must distribute its transmissions over the minimum number of hopping channels specified in this section.
- (h) The incorporation of intelligence within a frequency hopping spread spectrum system that permits the system to recognize other users within the spectrum band so that it individually and independently chooses and adapts its hopsets to avoid hopping on occupied channels is permitted. The coordination of frequency hopping systems in any other manner for the express purpose of avoiding the simultaneous occupancy of individual hopping frequencies by multiple transmitters is not permitted.

#### 5.2 Frequency Hopping System

This transmitter device is frequency hopping device, and complies with FCC part 15.247 rule.

This device uses Bluetooth radio which operates in 2400-2483.5 MHz band. Bluetooth uses a radio technology called frequency-hopping spread spectrum, which chops up the data being sent and transmits chunks of it on up to 79 bands (1 MHz each; centred from 2402 to 2480 MHz) in the range 2,400-2,483.5 MHz. The transmitter switches hop frequencies 1,600 times per second to assure a high degree of data security. All Bluetooth devices participating in a given piconet are synchronized to the frequency-hopping channel for the piconet. The frequency hopping sequence is determined by the master's device address and the phase of the hopping sequence (the frequency to hop at a specific time) is determined by the master's internal clock. Therefore, all slaves in a piconet must know the master's device address and must synchronize their clocks with the master's clock.

Adaptive Frequency Hopping (AFH) was introduced in the Bluetooth specification to provide an effective way for a Bluetooth radio to counteract normal interference. AFH identifies "bad" channels, where either other wireless devices are interfering with the Bluetooth signal or the Bluetooth signal is interfering with another device. The AFH-enabled Bluetooth device will then communicate with other devices within its piconet to share details of any identified bad channels. The devices will then switch to alternative available "good" channels, away from the areas of interference, thus having no impact on the bandwidth used.

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This device was tested with an bluetooth system receiver to check that the device maintained hopping synchronization, and the device complied with these requirements for DA 00-705 and FCC Part 15.247 rule.

#### **5.3 EUT Pseudorandom Frequency Hopping Sequence**

Pseudorandom Frequency Hopping Sequence Table as below:

Channel: 08, 24, 40, 56, 40, 56, 72, 09, 01, 09, 33, 41, 33, 41, 65, 73, 53, 69, 06, 22, 04, 20, 36, 52, 38, 46, 70, 78, 68, 76, 21, 29, 10, 26, 42, 58, 44, 60, 76, 13, 03, 11, 35, 43, 37, 45, 69, 77, 55, 71, 08, 24, 08, 24, 40, 56, 40, 48, 72, 01, 72, 01, 25, 33, 12, 28, 44, 60, 42, 58, 74, 11, 05, 13, 37, 45 etc.

The system receiver have input bandwidths that match the hopping channel bandwidths of their corresponding transmitters and shift frequencies in synchronization with the transmitted signals.

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### 6. Quantity of Hopping Channels and Channel Separation

### **6.1 Standard Applicable**

According to FCC 15.247(a)(1), frequency hopping systems operating in the 2400-2483.5 MHz band may have hopping channel carrier frequencies that are separated by 25 kHz or two-thirds of the 20 dB bandwidth of the hopping channel, and frequency hopping systems in the 2400-2483.5 MHz band shall use at least 15 channels.

#### **6.2 Test Procedure**

According to ANSI C63.10-2013 section 7.8.3, the number of hopping frequencies test method as follows.

- a) Span: The frequency band of operation. Depending on the number of channels the device supports, it may be necessary to divide the frequency range of operation across multiple spans, to allow the individual channels to be clearly seen.
- b) RBW: To identify clearly the individual channels, set the RBW to less than 30% of the channel spacing or the 20 dB bandwidth, whichever is smaller.
- c) VBW  $\geq$  RBW.
- d) Sweep: Auto.
- e) Detector function: Peak.
- f) Trace: Max hold.
- g) Allow the trace to stabilize.

According to ANSI C63.10-2013 section 7.8.2, the EUT shall have its hopping function enabled, the Carrier frequency separation test method as follows:

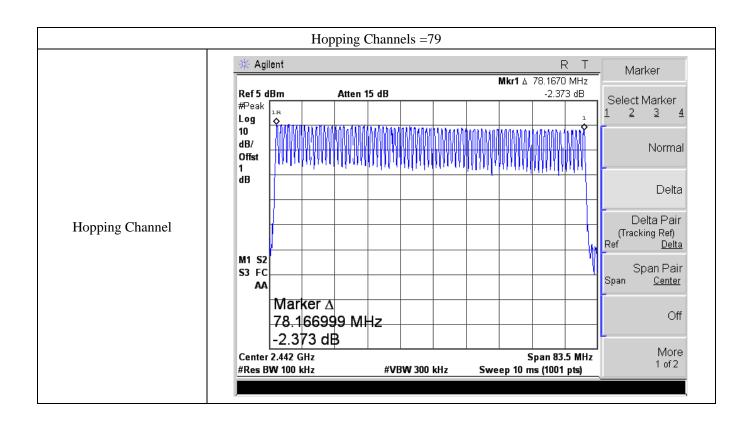
- a) Span: Wide enough to capture the peaks of two adjacent channels.
- b) RBW: Start with the RBW set to approximately 30% of the channel spacing; adjust as necessary to best identify the center of each individual channel.
- c) Video (or average) bandwidth (VBW)  $\geq$  RBW.
- d) Sweep: Auto.
- e) Detector function: Peak.
- f) Trace: Max hold.
- g) Allow the trace to stabilize.

Use the marker-delta function to determine the separation between the peaks of the adjacent channels.

#### 6.3 Summary of Test Results/Plots

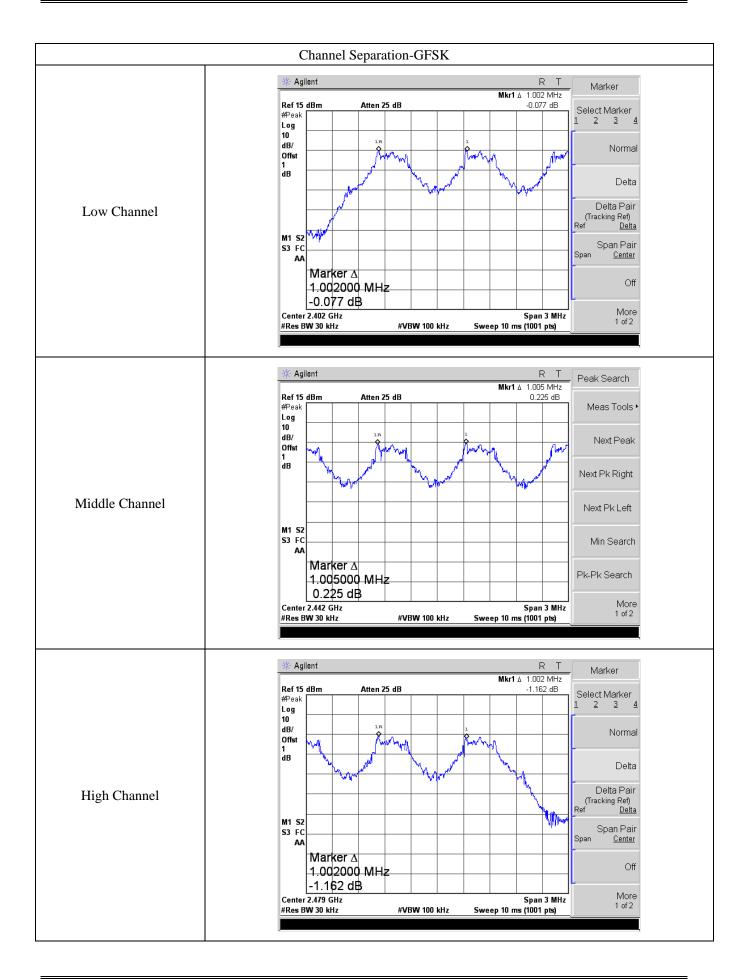
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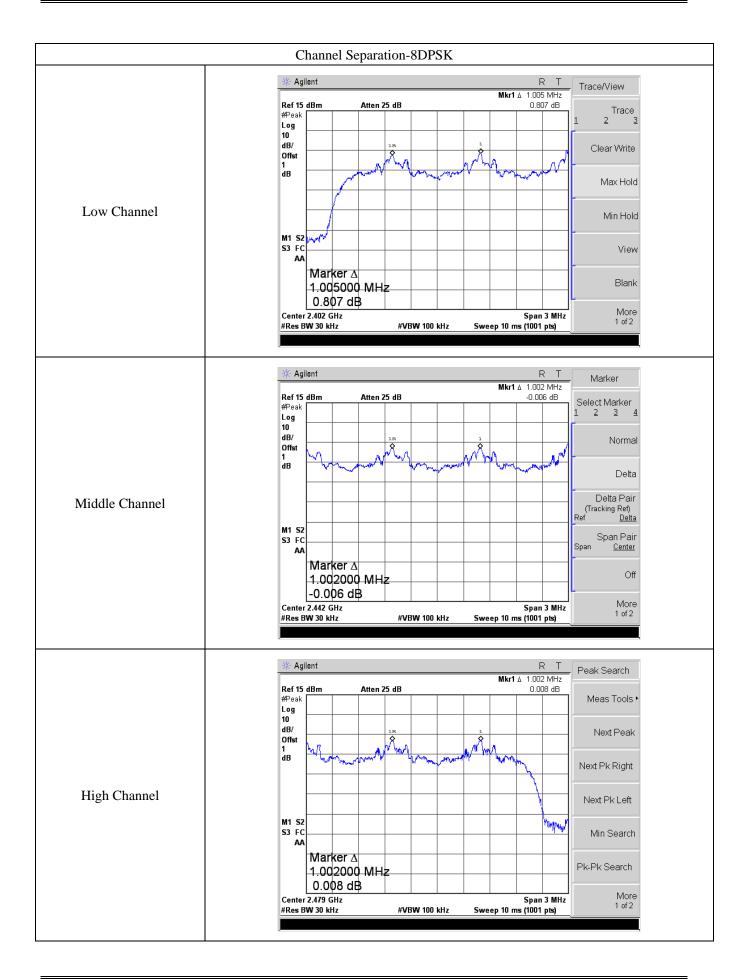


Mode	Channel	Carrier Frequencies Separation (kHz)	Result
	Low	1002	Pass
GFSK	Middle	1002	Pass
	High	1002	Pass
	Low	1005	Pass
8DPSK	Middle	1002	Pass
	High	1002	Pass











### 7. Dwell Time of Hopping Channel

### 7.1 Standard Applicable

According to 15.247(a)(1)(iii), Frequency hopping systems in the 2400–2483.5 MHz band shall use at least 15 channels. The average time of occupancy on any channel shall not be greater than 0.4 seconds within a period of 0.4 seconds multiplied by the number of hopping channels employed.

#### 7.2 Test Procedure

According to ANSI C63.10-2013 section 7.8.4, the dwell time of a hopping channel test method as follows.

a) Span: Zero span, centered on a hopping channel.

b) RBW shall be  $\leq$  channel spacing and where possible RBW should be set  $\gg$  1 / T, where T is the expected dwell time per channel.

c) Sweep: As necessary to capture the entire dwell time per hopping channel; where possible use a video trigger and trigger delay so that the transmitted signal starts a little to the right of the start

of the plot. The trigger level might need slight adjustment to prevent triggering when the system hops on an adjacent channel; a second plot might be needed with a longer sweep time to show two successive hops on a channel.

d) Detector function: Peak.

e) Trace: Max hold.

Use the marker-delta function to determine the transmit time per hop. If this value varies with different modes of operation (data rate, modulation format, number of hopping channels, etc.), then repeat this test for each variation in transmit time.

Repeat the measurement using a longer sweep time to determine the number of hops over the period specified in the requirements. The sweep time shall be equal to, or less than, the period specified in the requirements. Determine the number of hops over the sweep time and calculate the total number of hops in the period specified in the requirements, using the following equation:

(Number of hops in the period specified in the requirements) =

(number of hops on spectrum analyzer) × (period specified in the requirements / analyzer sweep time)

The average time of occupancy is calculated from the transmit time per hop multiplied by the number of hops in the period specified in the requirements. If the number of hops in a specific time varies with different modes of operation (data rate, modulation format, number of hopping channels, etc.), then repeat this test for each variation. The measured transmit time and time between hops shall be consistent with the values described in the operational description for the EUT.

#### 7.3 Summary of Test Results/Plots

The dwell time within a period in data mode is independent from the packet type (packet length). Test data is corrected with the worse case, which the packet length is DH1, DH3, and DH5.

The test period: T = 0.4 Second \* 79 Channel = 31.6 s

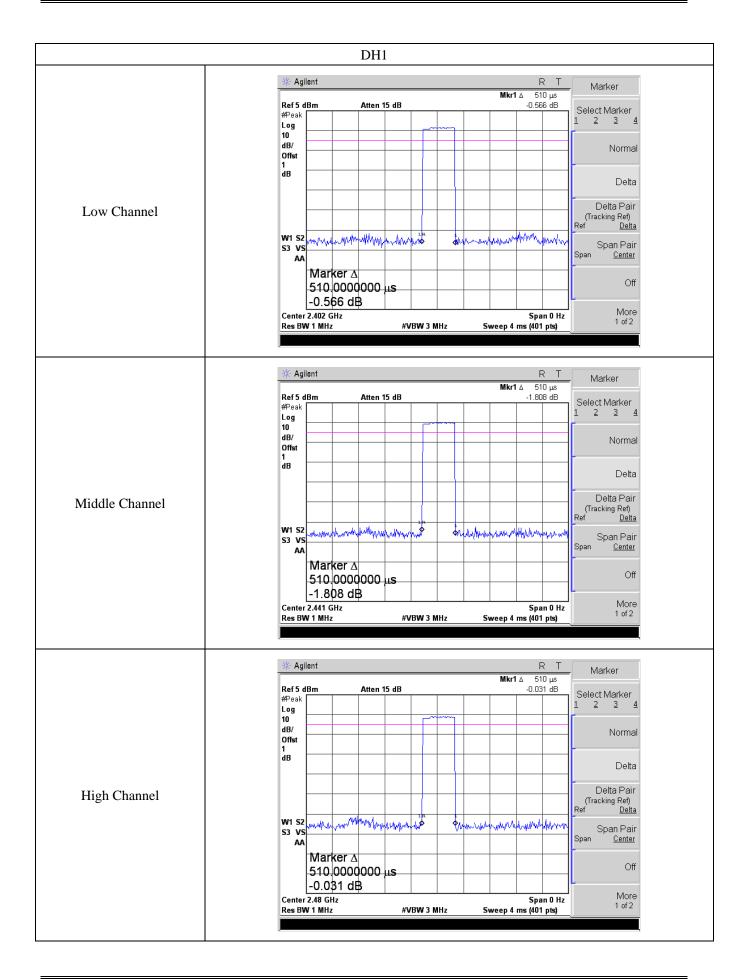
Dwell time = time slot length \* (Hopping rate / Number of hopping channels) \* Period



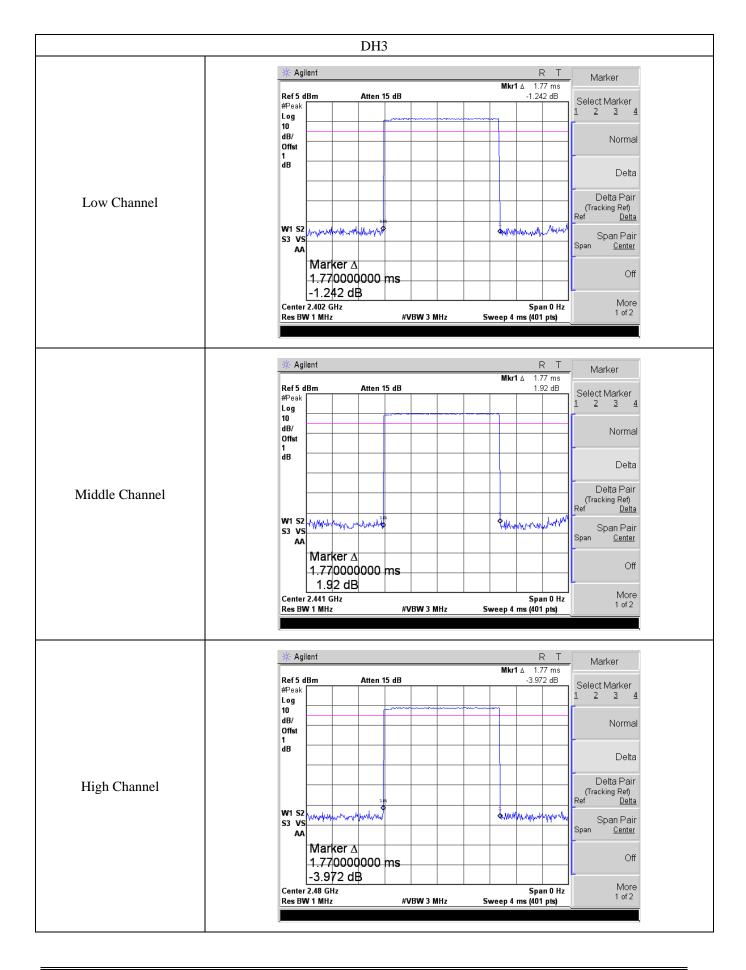
N	Test Channel	Packet	Time Slot Length	Dwell Time	Limit
Modulation			ms	ms	ms
		DH1	0.51	163.200	400
	Low	DH3	1.77	283.200	400
		DH5	3.01	321.067	400
		DH1	0.51	163.200	400
GFSK	Middle	DH3	1.77	283.200	400
		DH5	3.02	322.133	400
	High	DH1	0.51	163.200	400
		DH3	1.77	283.200	400
		DH5	3.02	322.133	400
8DPSK	Low	3DH1	0.54	172.800	400
		3DH3	1.78	284.800	400
		3DH5	3.02	322.133	400
		3DH1	0.52	166.400	400
	Middle	3DH3	1.78	284.800	400
		3DH5	3.02	322.133	400
	High	3DH1	0.53	169.600	400
		3DH3	1.77	283.200	400
		3DH5	3.03	323.200	400

Please refer to the test plots as below:

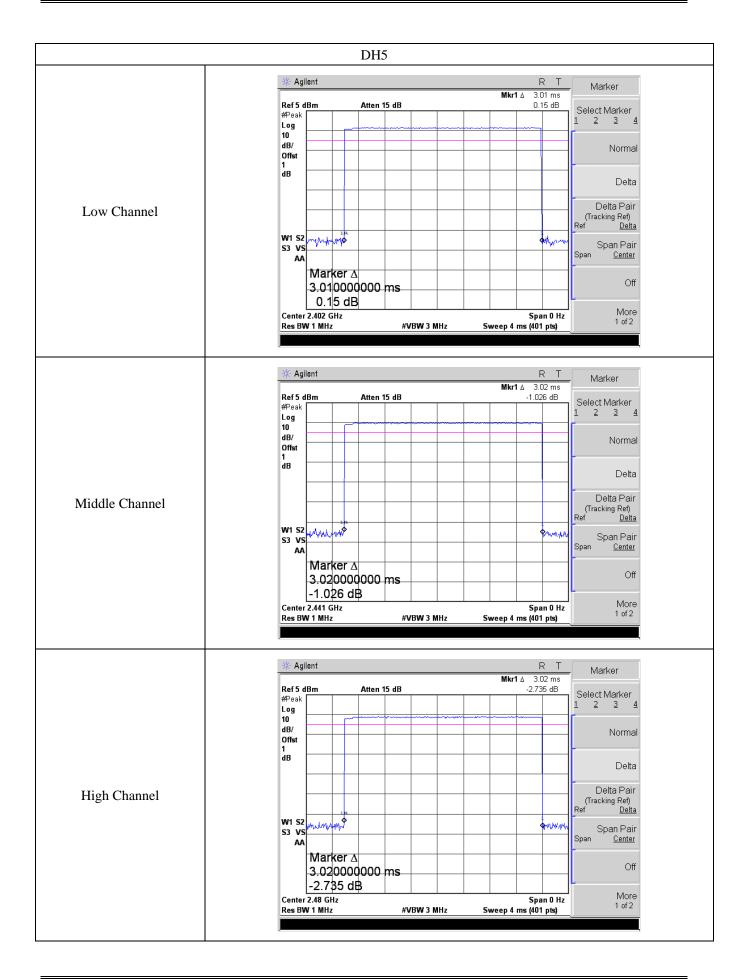




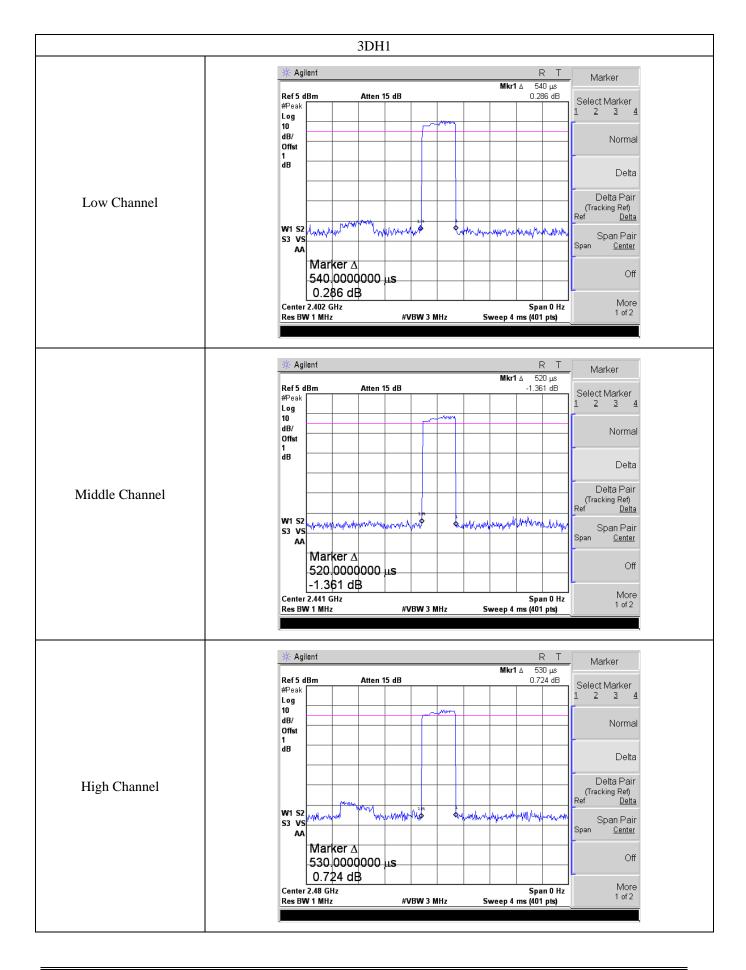




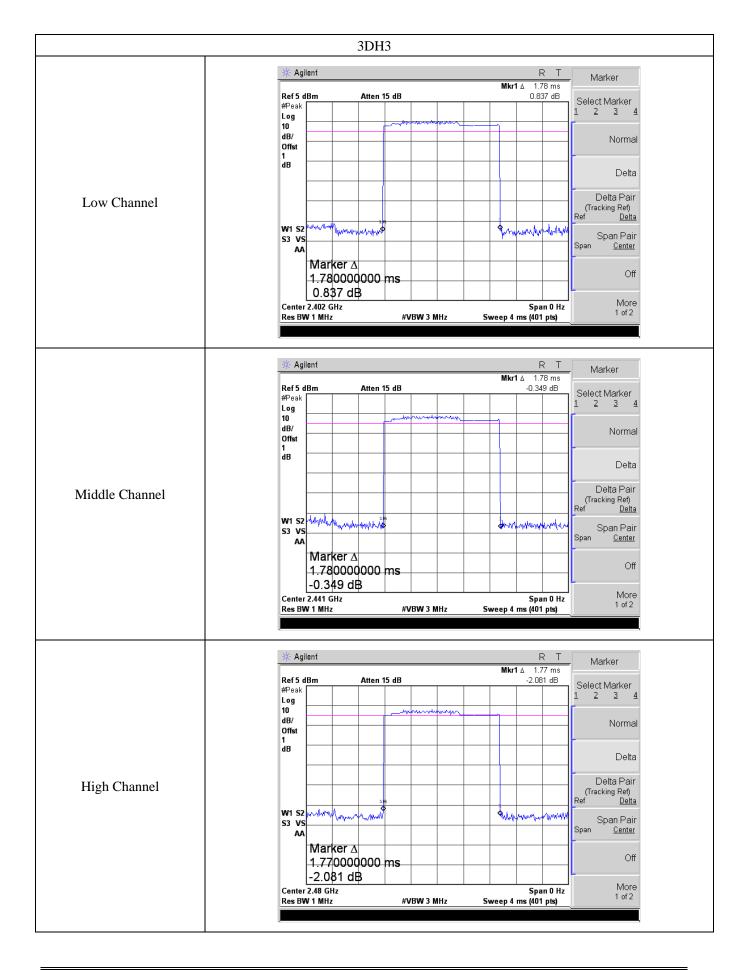




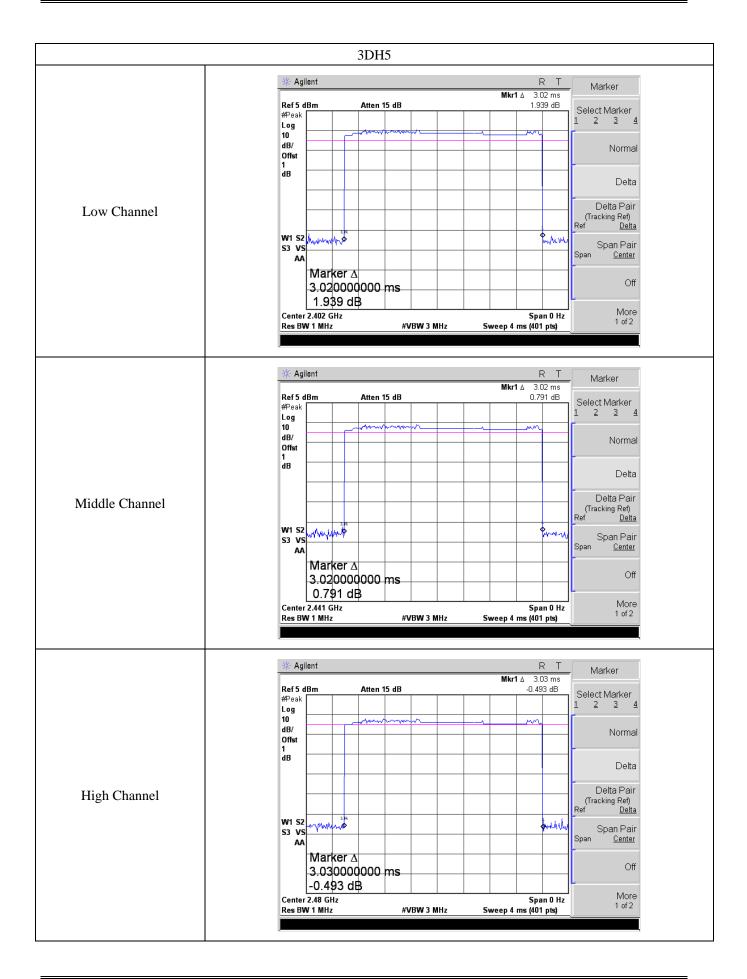












#### 8. 20dB Bandwidth

### 8.1 Standard Applicable

According to 15.247(a) and 15.215(c). 20dB bandwidth is recommended that the fundamental emission be kept within at least the central 80% of the permitted band in order to minimize the possibility of out-of-band operation.

#### **8.2 Test Procedure**

According to ANSI C63.10-2013 section 6.9.2, the 20dB bandwidth test method as follows.

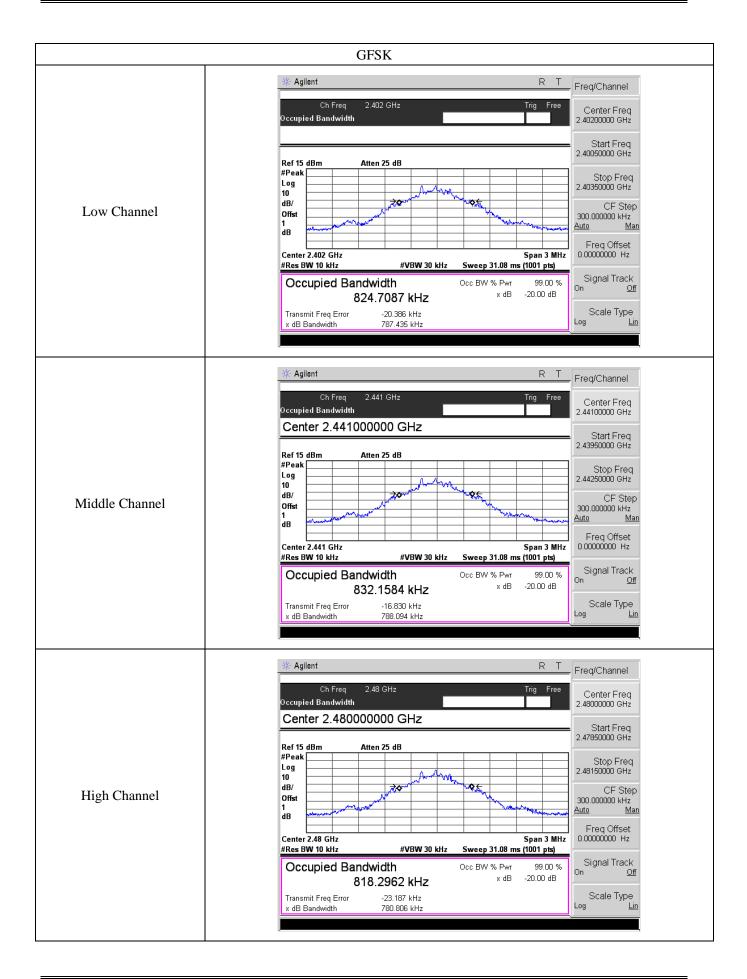
- a) The spectrum analyzer center frequency is set to the nominal EUT channel center frequency. The span range for the EMI receiver or spectrum analyzer shall be between two times and five times the OBW.
- b) The nominal IF filter bandwidth (3 dB RBW) shall be in the range of 1% to 5% of the OBW and video bandwidth (VBW) shall be approximately three times RBW, unless otherwise specified by the applicable requirement.
- c) Set the reference level of the instrument as required, keeping the signal from exceeding the maximum input mixer level for linear operation. In general, the peak of the spectral envelope shall be more than [10 log (OBW/RBW)] below the reference level.
- d) Steps a) through c) might require iteration to adjust within the specified tolerances.
- e) The dynamic range of the instrument at the selected RBW shall be more than 10 dB below the target "-xx dB down" requirement; that is, if the requirement calls for measuring the -20 dB OBW, the instrument noise floor at the selected RBW shall be at least 30 dB below the reference value.
- f) Set detection mode to peak and trace mode to max hold.
- g) Determine the reference value: Set the EUT to transmit an unmodulated carrier or modulated signal, as applicable. Allow the trace to stabilize. Set the spectrum analyzer marker to the highest level of the displayed trace (this is the reference value).
- h) Determine the "-xx dB down amplitude" using [(reference value) -xx]. Alternatively, this calculation may be made by using the marker-delta function of the instrument.
- i) If the reference value is determined by an unmodulated carrier, then turn the EUT modulation ON, and either clear the existing trace or start a new trace on the spectrum analyzer and allow the new trace to stabilize. Otherwise, the trace from step g) shall be used for step j).
- j) Place two markers, one at the lowest frequency and the other at the highest frequency of the envelope of the spectral display, such that each marker is at or slightly below the "-xx dB down amplitude" determined in step h). If a marker is below this "-xx dB down amplitude" value, then it shall be as close as possible to this value. The occupied bandwidth is the frequency difference between the two markers. Alternatively, set a marker at the lowest frequency of the envelope of the spectral display, such that the marker is at or slightly below the "-xx dB down amplitude" determined in step h). Reset the marker-delta function and move the marker to the other side of the emission until the delta marker amplitude is at the same level as the reference marker amplitude. The marker-delta frequency reading at this point is the specified emission bandwidth.
- k) The occupied bandwidth shall be reported by providing plot(s) of the measuring instrument display; the plot axes and the scale units per division shall be clearly labeled. Tabular data may be reported in addition to the plot(s).



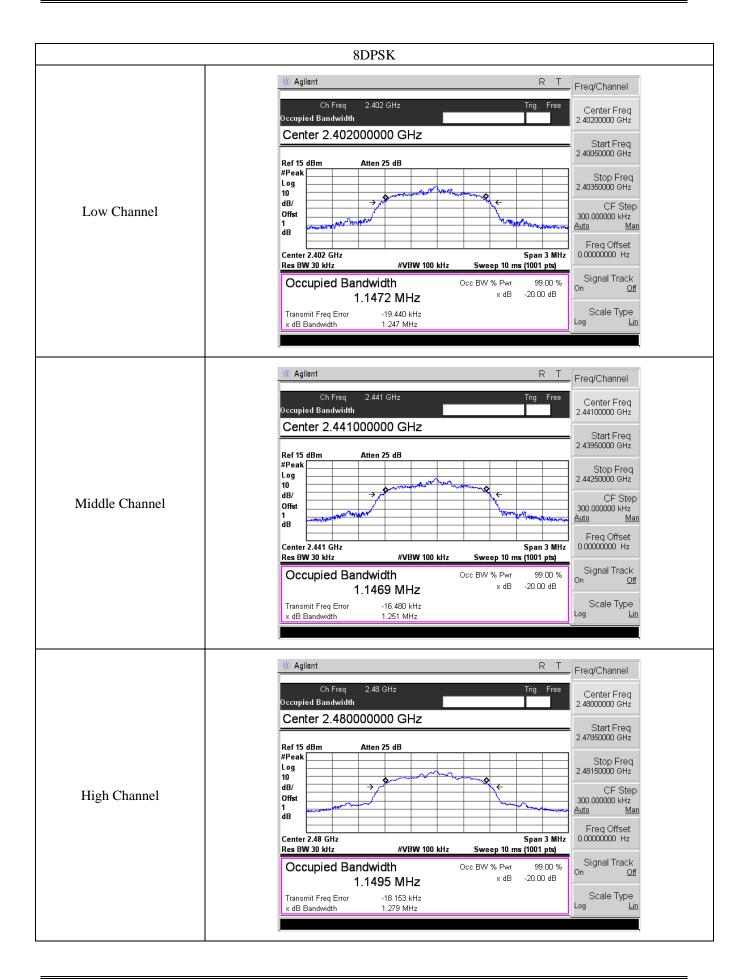
# **8.3 Summary of Test Results/Plots**

Test Mode	Test Channel MHz	20 dB Bandwidth kHz	Result	
	2402	787.435	Pass	
GFSK	2441	788.094	Pass	
	2480	780.806	Pass	
8DPSK	2402	1260	Pass	
	2441	1270	Pass	
	2480	1257	Pass	













### 9. RF Output Power

### 9.1 Standard Applicable

According to 15.247(b)(1). For frequency hopping systems operating in the 2400–2483.5 MHz band employing at least 75 non-overlapping hopping channels, and all frequency hopping systems in the 5725–5850 MHz band: 1 watt. For all other frequency hopping systems in the 2400–2483.5 MHz band: 0.125 watts.

#### 9.2 Test Procedure

According to ANSI C63.10-2013 section 7.8.5, the output power test method as follows.

Remove the antenna from the EUT and then connect a low loss RF cable from the antenna port to the spectrum analyzer.

This is an RF-conducted test to evaluate maximum peak output power. Use a direct connection between the antenna port of the unlicensed wireless device and the spectrum analyzer, through suitable attenuation. The hopping shall be disabled for this test:

- a) Use the following spectrum analyzer settings:
  - 1) Span: Approximately five times the 20 dB bandwidth, centered on a hopping channel.
  - 2) RBW > 20 dB bandwidth of the emission being measured.
  - 3) VBW  $\geq$  RBW.
  - 4) Sweep: Auto.
  - 5) Detector function: Peak.
  - 6) Trace: Max hold.
- b) Allow trace to stabilize.
- c) Use the marker-to-peak function to set the marker to the peak of the emission.
- d) The indicated level is the peak output power, after any corrections for external attenuators and cables.
- e) A plot of the test results and setup description shall be included in the test report.

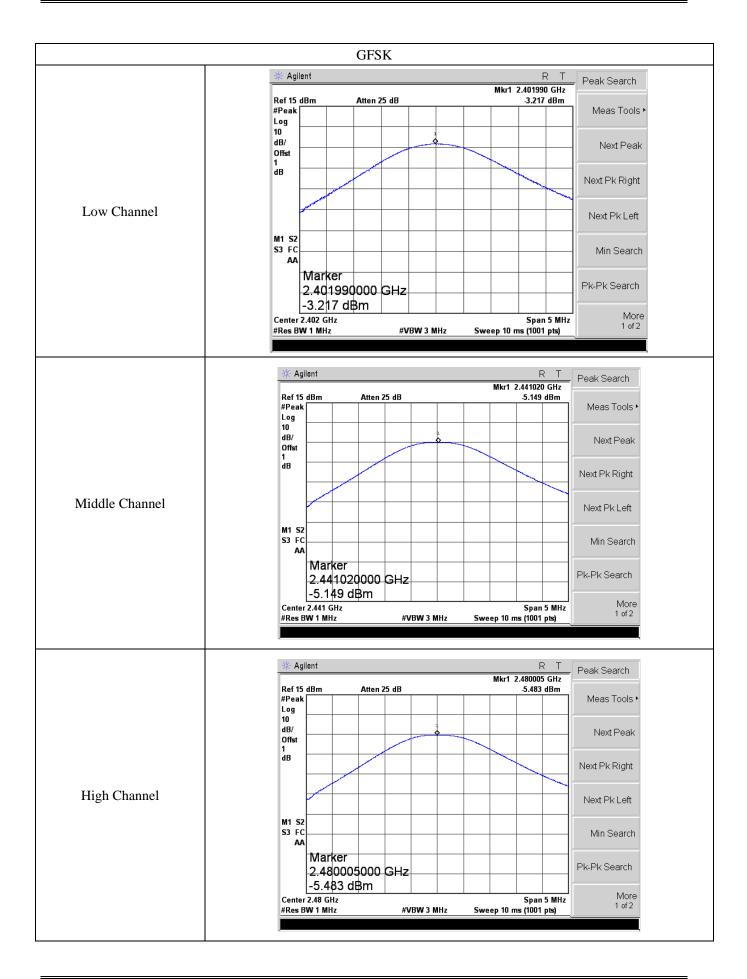
### 9.3 Summary of Test Results/Plots



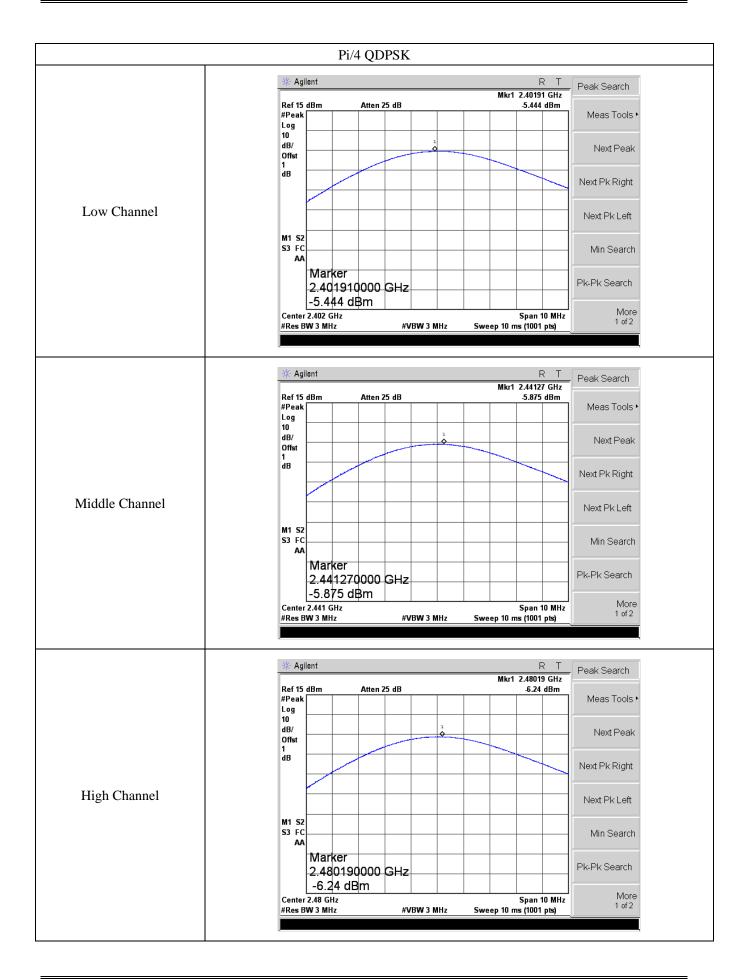
Modulation type	Channel	Output power (dBm)	Output power (mW)	Limit (mW)	Result
GFSK	Low	-3.217	0.48		
	Middle	-5.149	0.31	1000	Pass
	High	-5.483	0.28		
π/4DQPSK	Low	-5.444	0.29		
	Middle	-5.875	0.26	125	Pass
	High	-6.24	0.24		
8DPSK	Low	-5.156	0.31		
	Middle	-5.637	0.27	125	Pass
	High	-5.979	0.25		

Note: the antenna gain of 1.9dBi less than 6dBi maximum permission antenna gain value based on 1 watt peak output power limit.

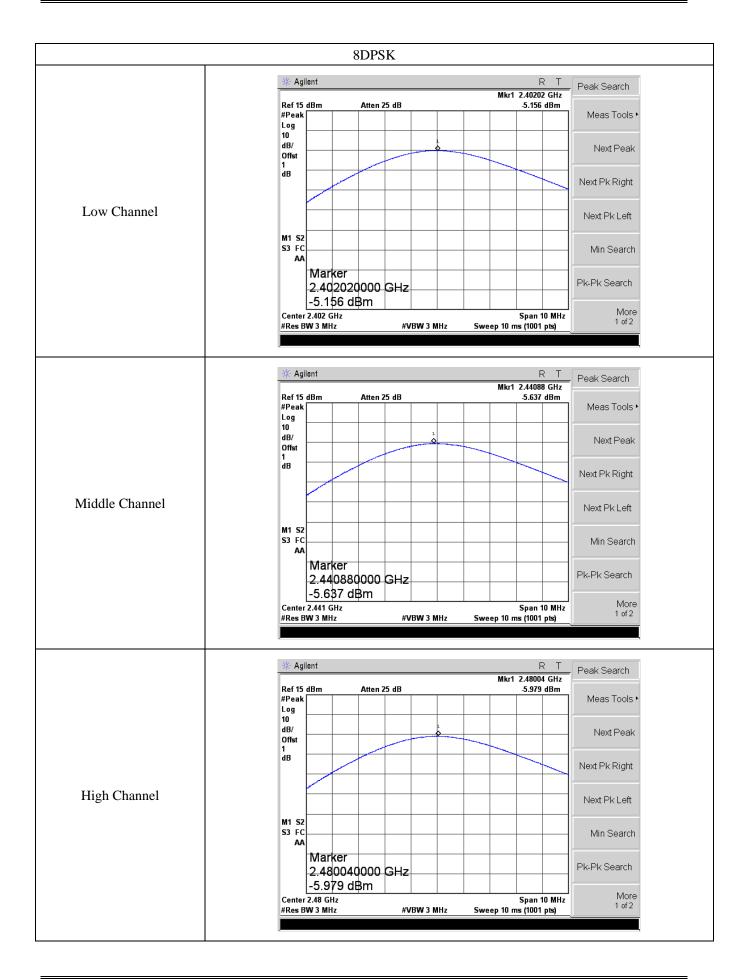














### 10. Field Strength of Spurious Emissions

#### 10.1 Standard Applicable

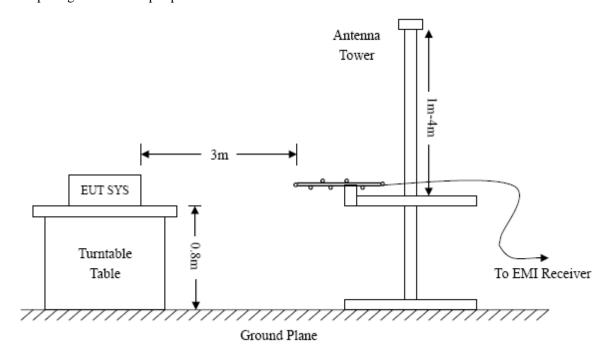
According to §15.247(d), in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within 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 §15.209(a).

The emission limit in this paragraph is based on measurement instrumentation employing an average detector. The provisions in §15.35 for limiting peak emissions apply. Spurious Radiated Emissions measurements starting below or at the lowest crystal frequency.

#### **10.2 Test Procedure**

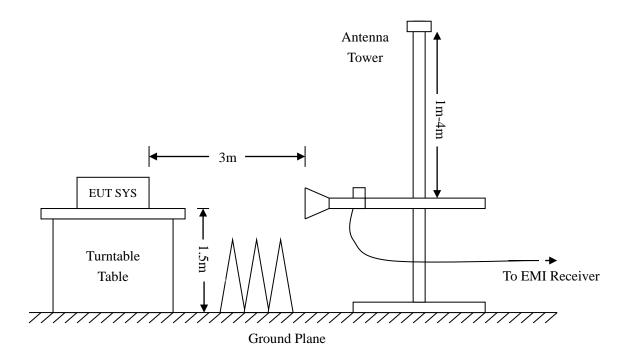
The setup of EUT is according with per ANSI C63.10-2013 measurement procedure. The specification used was with the FCC Part 15.205 15.247(a) and FCC Part 15.209 Limit.

The external I/O cables were draped along the test table and formed a bundle 30 to 40 cm long in the middle. The spacing between the peripherals was 10 cm.



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Frequency:9kHz-30MHz	Frequency:30MHz-1GHz	Frequency : Above 1GHz
RBW=10KHz,	RBW=120KHz,	RBW=1MHz,
VBW =30KHz	VBW=300KHz	VBW=3MHz(Peak), 10Hz(AV)
Sweep time= Auto	Sweep time= Auto	Sweep time= Auto
Trace = max hold	$Trace = max \ hold$	Trace = max hold
Detector function = peak	Detector function = peak, QP	Detector function = peak, AV

#### 10.3 Corrected Amplitude & Margin Calculation

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

The "Margin" column of the following data tables indicates the degree of compliance with the applicable limit. For example, a margin of  $-6dB\mu V$  means the emission is  $6dB\mu V$  below the maximum limit. The equation for margin calculation is as follows:

#### 10.4 Summary of Test Results/Plots

Note: this EUT was tested in 3 orthogonal positions and the worst case position data was reported.

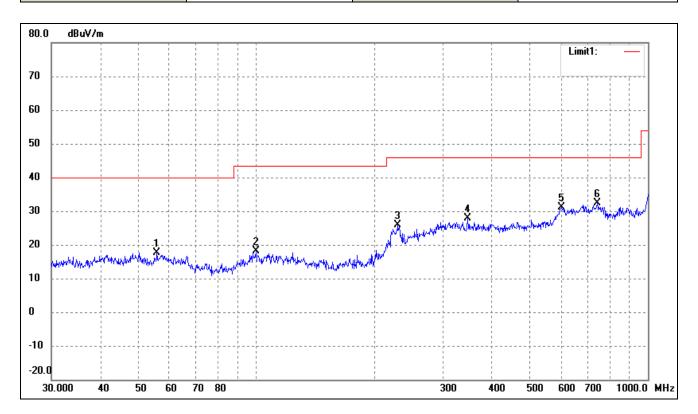
All test modes (different data rate and different modulation) are performed, but only the worst case is recorded in this report.

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### > Spurious Emissions Below 1GHz

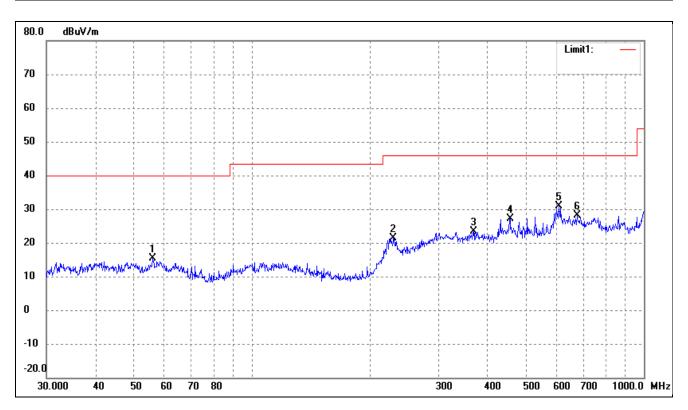
Test Channel	Low	Polarity:	Horizontal
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No.	Frequency	Reading	Correct	Result	Limit	Margin	Degree	Height	Remark
	(MHz)	(dBuV/m)	dB/m	(dBuV/m)	(dBuV/m)	(dB)	( )	(cm)	
1	55.8047	36.07	-18.37	17.70	40.00	-22.30	312	100	peak
2	99.8777	36.37	-18.12	18.25	43.50	-25.25	96	100	peak
3	230.0985	38.74	-12.79	25.95	46.00	-20.05	276	100	peak
4	346.8092	36.45	-8.51	27.94	46.00	-18.06	109	100	peak
5	601.4265	33.84	-2.66	31.18	46.00	-14.82	271	100	peak
6	742.2587	34.92	-2.47	32.45	46.00	-13.55	293	100	peak



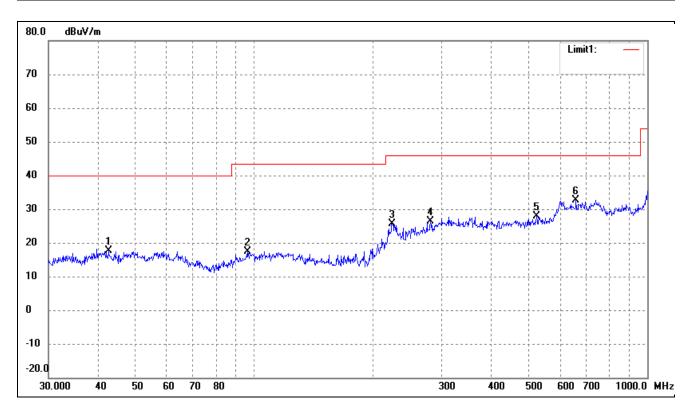




No.	Frequency	Reading	Correct	Result	Limit	Margin	Degree	Height	Remark
	(MHz)	(dBuV/m)	dB/m	(dBuV/m)	(dBuV/m)	(dB)	( )	(cm)	
1	56.0007	33.73	-18.36	15.37	40.00	-24.63	340	100	peak
2	230.0985	34.18	-12.79	21.39	46.00	-24.61	98	100	peak
3	368.1116	31.80	-8.34	23.46	46.00	-22.54	56	100	peak
4	455.9058	34.88	-7.78	27.10	46.00	-18.90	115	100	peak
5	607.7867	34.07	-3.10	30.97	46.00	-15.03	189	100	peak
6	675.2080	31.15	-2.91	28.24	46.00	-17.76	130	100	peak



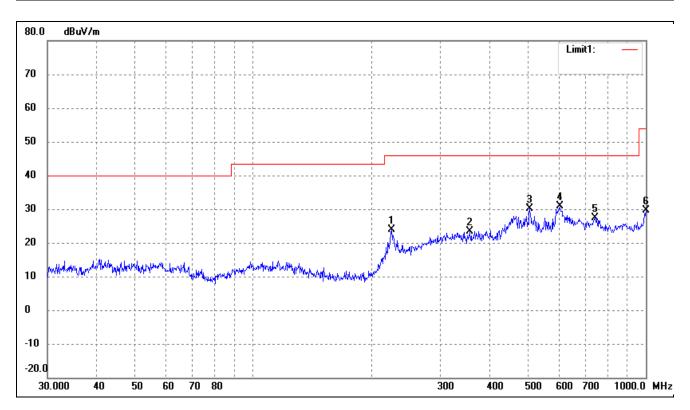




No.	Frequency	Reading	Correct	Result	Limit	Margin	Degree	Height	Remark
	(MHz)	(dBuV/m)	dB/m	(dBuV/m)	(dBuV/m)	(dB)	( )	(cm)	
1	42.6000	36.30	-18.55	17.75	40.00	-22.25	190	100	peak
2	96.0986	36.09	-18.74	17.35	43.50	-26.15	177	100	peak
3	224.5193	38.93	-13.29	25.64	46.00	-20.36	91	100	peak
4	281.0075	35.30	-8.98	26.32	46.00	-19.68	126	100	peak
5	522.7180	35.10	-7.25	27.85	46.00	-18.15	158	100	peak
6	658.8362	36.40	-3.72	32.68	46.00	-13.32	213	100	peak



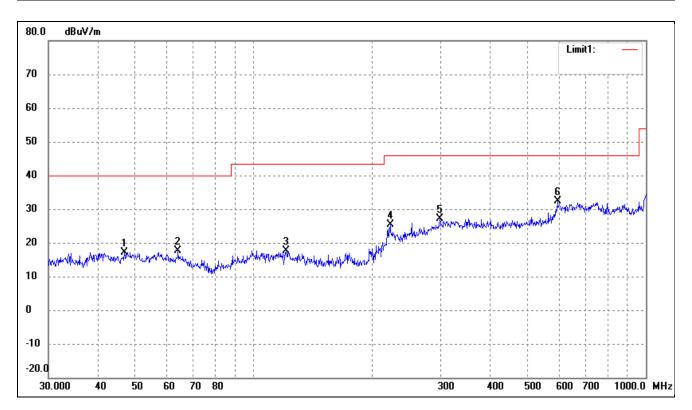




No.	Frequency	Reading	Correct	Result	Limit	Margin	Degree	Height	Remark
	(MHz)	(dBuV/m)	dB/m	(dBuV/m)	(dBuV/m)	(dB)	( )	(cm)	
1	225.3080	37.08	-13.22	23.86	46.00	-22.14	181	100	peak
2	356.6758	31.64	-8.32	23.32	46.00	-22.68	218	100	peak
3	506.4791	37.61	-7.56	30.05	46.00	-15.95	95	100	peak
4	603.5392	33.78	-2.80	30.98	46.00	-15.02	185	100	peak
5	742.2587	29.88	-2.47	27.41	46.00	-18.59	100	100	peak
6	1000.0000	30.64	-0.89	29.75	54.00	-24.25	92	100	peak



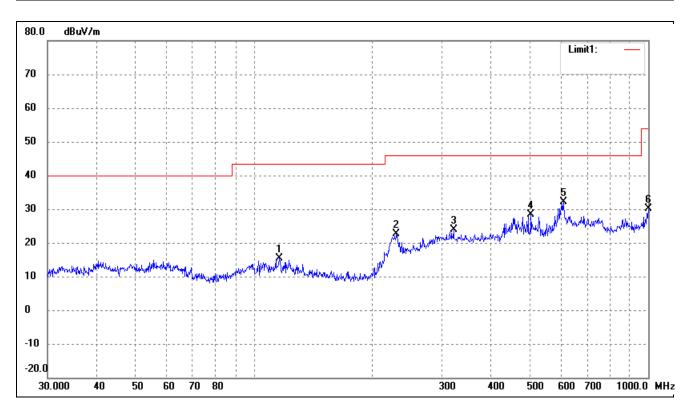




No.	Frequency	Reading	Correct	Result	Limit	Margin	Degree	Height	Remark
	(MHz)	(dBuV/m)	dB/m	(dBuV/m)	(dBuV/m)	(dB)	( )	(cm)	
1	46.8303	35.82	-18.58	17.24	40.00	-22.76	107	100	peak
2	64.2074	36.77	-19.15	17.62	40.00	-22.38	196	100	peak
3	121.1231	35.64	-17.94	17.70	43.50	-25.80	131	100	peak
4	222.9502	38.81	-13.44	25.37	46.00	-20.63	149	100	peak
5	298.2681	35.14	-8.01	27.13	46.00	-18.87	53	100	peak
6	595.1329	35.94	-3.44	32.50	46.00	-13.50	244	100	peak







No.	Frequency	Reading	Correct	Result	Limit	Margin	Degree	Height	Remark
	(MHz)	(dBuV/m)	dB/m	(dBuV/m)	(dBuV/m)	(dB)	( )	(cm)	
1	116.1321	33.41	-17.91	15.50	43.50	-28.00	65	100	peak
2	230.0985	35.32	-12.79	22.53	46.00	-23.47	142	100	peak
3	321.0608	31.96	-7.96	24.00	46.00	-22.00	64	100	peak
4	504.7062	35.97	-7.60	28.37	46.00	-17.63	132	100	peak
5	609.9217	35.41	-3.25	32.16	46.00	-13.84	69	100	peak
6	1000.0000	30.90	-0.89	30.01	54.00	-23.99	134	100	peak



# > Spurious Emissions Above 1GHz

Frequency	Reading	Correct	Result	Limit	Margin	Polar	Detector
(MHz)	(dBuV/m)	dB	(dBuV/m)	(dBuV/m)	(dB)	H/V	
			Low Channe	el-2402MHz			
4804	60.3	-3.59	56.71	74	-17.29	Н	Peak
4804	41.3	-3.59	37.71	54	-16.29	Н	AV
7206	59.32	-0.52	58.8	74	-15.2	Н	Peak
7206	39.5	-0.52	38.98	54	-15.02	Н	AV
4804	60.5	-3.59	56.91	74	-17.09	V	Peak
4804	41.35	-3.59	37.76	54	-16.24	V	AV
7206	61.5	-0.52	60.98	74	-13.02	V	Peak
7206	40.19	-0.52	39.67	54	-14.33	V	AV
			Middle Chan	nel-2441MHz			
4882	60.51	-3.49	57.02	74	-16.98	Н	Peak
4882	41.54	-3.49	38.05	54	-15.95	Н	AV
7323	61.78	-0.47	61.31	74	-12.69	Н	Peak
7323	41.77	-0.47	41.3	54	-12.7	Н	AV
4882	58.78	-3.49	55.29	74	-18.71	V	Peak
4882	39.87	-3.49	36.38	54	-17.62	V	AV
7323	61.92	-0.47	61.45	74	-12.55	V	Peak
7323	38.2	-0.47	37.73	54	-16.27	V	AV
			High Chann	el-2480MHz			
4960	61.74	-3.41	58.33	74	-15.67	Н	Peak
4960	40.27	-3.41	36.86	54	-17.14	Н	AV
7440	58.28	-0.42	57.86	74	-16.14	Н	Peak
7440	39.68	-0.42	39.26	54	-14.74	Н	AV
4960	58.4	-3.41	54.99	74	-19.01	V	Peak
4960	40.82	-3.41	37.41	54	-16.59	Н	AV
7440	60.89	-0.42	60.47	74	-13.53	V	Peak
7440	40.65	-0.42	40.23	54	-13.77	V	AV

Note: Testing is carried out with frequency rang 9kHz to the tenth harmonics, other than listed in the table above are attenuated more than 20dB below the permissible limits or the field strength is too small to be measured.

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Model: Commuter

# 11. Out of Band Emissions

### 11.1 Standard Applicable

According to §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 §15.209(a).

#### 11.2 Test Procedure

According to ANSI C63.10-2013 section 7.8.6, the Band-edge measurements for RF conducted emissions test method as follows.

- a) Connect the EMI receiver or spectrum analyzer to the EUT using an appropriate RF cable connected to the EUT output. Configure the spectrum analyzer settings as described in step e) (be sure to enter all losses between the unlicensed wireless device output and the spectrum analyzer).
- b) Set the EUT to the lowest frequency channel (for the hopping on test, the hopping sequence shall include the lowest frequency channel).
- c) Set the EUT to operate at maximum output power and 100% duty cycle, or equivalent "normal mode of operation" as specified in 6.10.3.
- d) If using the radiated method, then use the applicable procedure(s) of 6.4, 6.5, or 6.6, and orient the EUT and measurement antenna positions to produce the highest emission level.
- e) Perform the test as follows:
  - 1) Span: Wide enough to capture the peak level of the emission operating on the channel closest to the band edge, as well as any modulation products that fall outside of the authorized band of operation.
  - 2) Reference level: As required to keep the signal from exceeding the maximum instrument input mixer level for linear operation. In general, the peak of the spectral envelope shall be more than [10 log (OBW/RBW)] below the reference level. Specific guidance is given in 4.1.5.2.
  - 3) Attenuation: Auto (at least 10 dB preferred).
  - 4) Sweep time: Coupled.
  - 5) Resolution bandwidth: 100 kHz.
  - 6) Video bandwidth: 300 kHz.
  - 7) Detector: Peak.8) Trace: Max hold.
- f) Allow the trace to stabilize. For the test with the hopping function turned ON, this can take several minutes to achieve a reasonable probability of intercepting any emissions due to oscillator overshoot.
- g) Set the marker on the emission at the band edge, or on the highest modulation product outside of the band, if this level is greater than that at the band edge. Enable the marker-delta function, and then use the marker-to-peak

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Model: Commuter

function to move the marker to the peak of the in-band emission.

- h) Repeat step c) through step e) for every applicable modulation.
- i) Set the EUT to the highest frequency channel (for the hopping on test, the hopping sequence shall include the highest frequency channel) and repeat step c) through step d).
- j) The band-edge measurement shall be reported by providing plot(s) of the measuring instrument display; the plot axes and the scale units per division shall be clearly labeled. Tabular data may be reported in addition to the plot(s).

Restricted-band band-edge test method please refers to ANSI C63.10-2013 section 6.10.5. The emission must comply with the 15.209 limit for fall in the restricted bands listed in section 15.205. Note that the method of measurement KDB publication number: 913591 may be used for the radiated band-edge measurements.

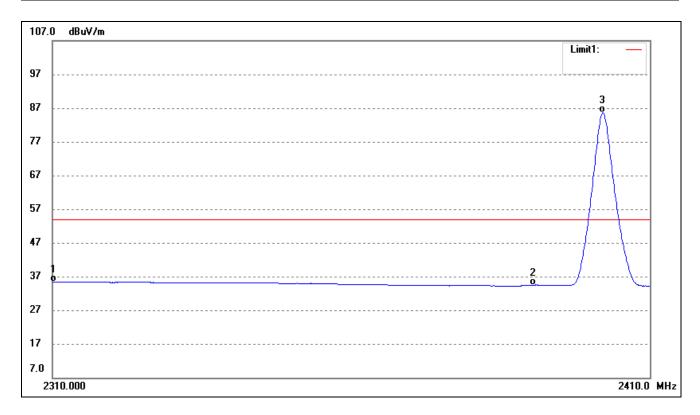
According to ANSI C63.10-2013 section 7.8.8, Conducted spurious emissions shall be measured for the transmit frequency, per 5.5 and 5.6, and at the maximum transmit powers.

Connect the primary antenna port through an attenuator to the spectrum analyzer input; in the results, account for all losses between the unlicensed wireless device output and the spectrum analyzer. The instrument shall span 30 MHz to 10 times the operating frequency in GHz, with a resolution bandwidth of 100 kHz, video bandwidth of 300 kHz, and a coupled sweep time with a peak detector. The band 30 MHz to the highest frequency may be split into smaller spans, as long as the entire spectrum is covered.

### 11.3 Summary of Test Results/Plots



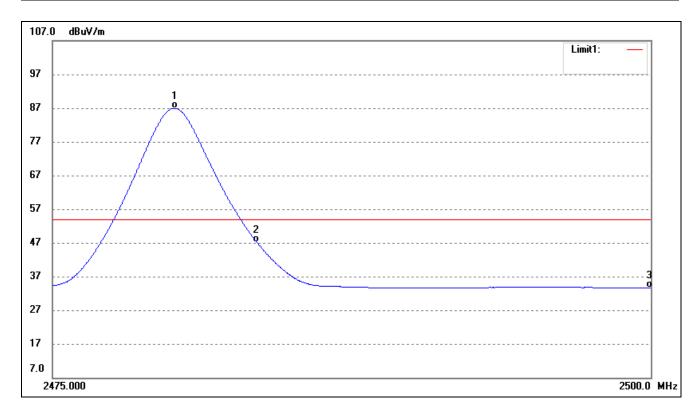




No.	Frequency	Reading	Correct	Result	Limit	Margin	Remark
	(MHz)	(dBuV/m)	Factor(dB)	(dBuV/m)	(dBuV/m)	(dB)	
1	2310.000	40.62	-5.28	35.34	54.00	-18.66	Average Detector
	2310.000	52.41	-5.28	47.13	74.00	-26.87	Peak Detector
2	2390.000	40.55	-6.12	34.43	54.00	-19.57	Average Detector
	2390.000	55.04	-6.12	48.92	74.00	-25.08	Peak Detector
3	2401.945	91.85	-6.24	85.61	/	/	Average Detector
	2401.843	101.72	-6.24	95.48	/	/	Peak Detector

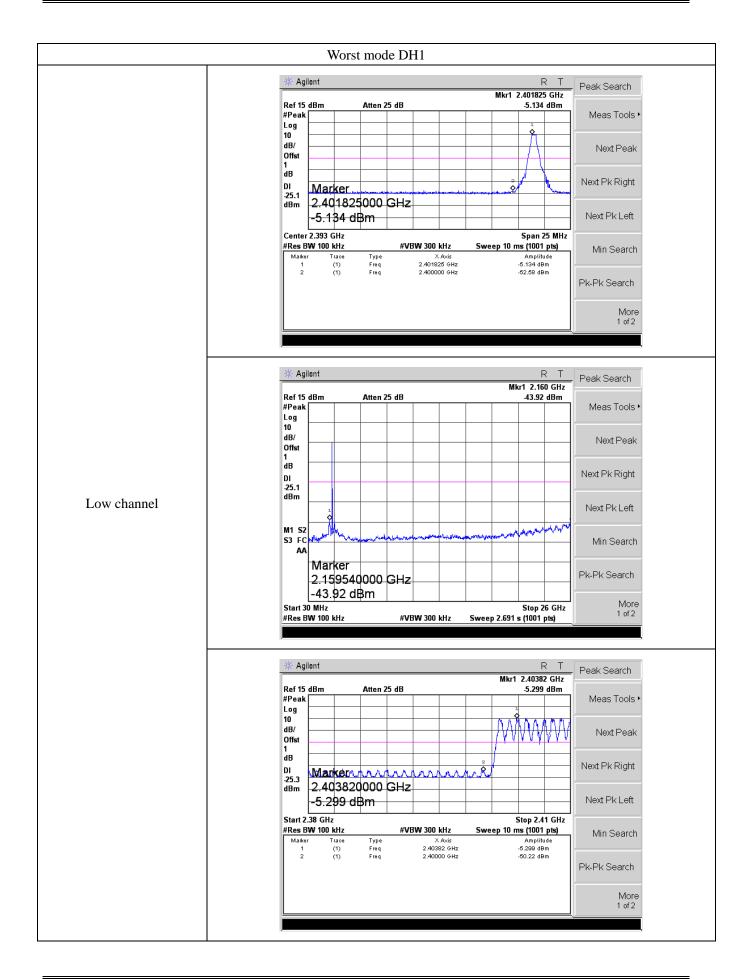




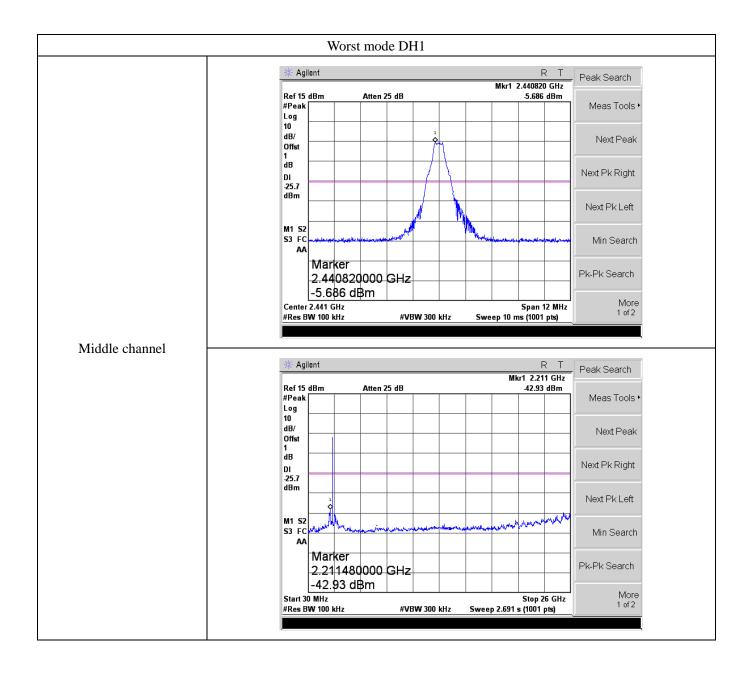


No.	Frequency	Reading	Correct	Result	Limit	Margin	Remark
	(MHz)	(dBuV/m)	Factor(dB)	(dBuV/m)	(dBuV/m)	(dB)	
1	2480.080	93.07	-6.08	86.99	/	/	Average Detector
	2480.005	102.56	-6.08	96.48	/	/	Peak Detector
2	2483.500	53.16	-6.08	47.08	54.00	-6.92	Average Detector
	2483.500	65.74	-6.08	59.66	74.00	-14.34	Peak Detector
3	2500.000	39.61	-6.04	33.57	54.00	-20.43	Average Detector
	2500.000	53.27	-6.04	47.23	74.00	-26.77	Peak Detector

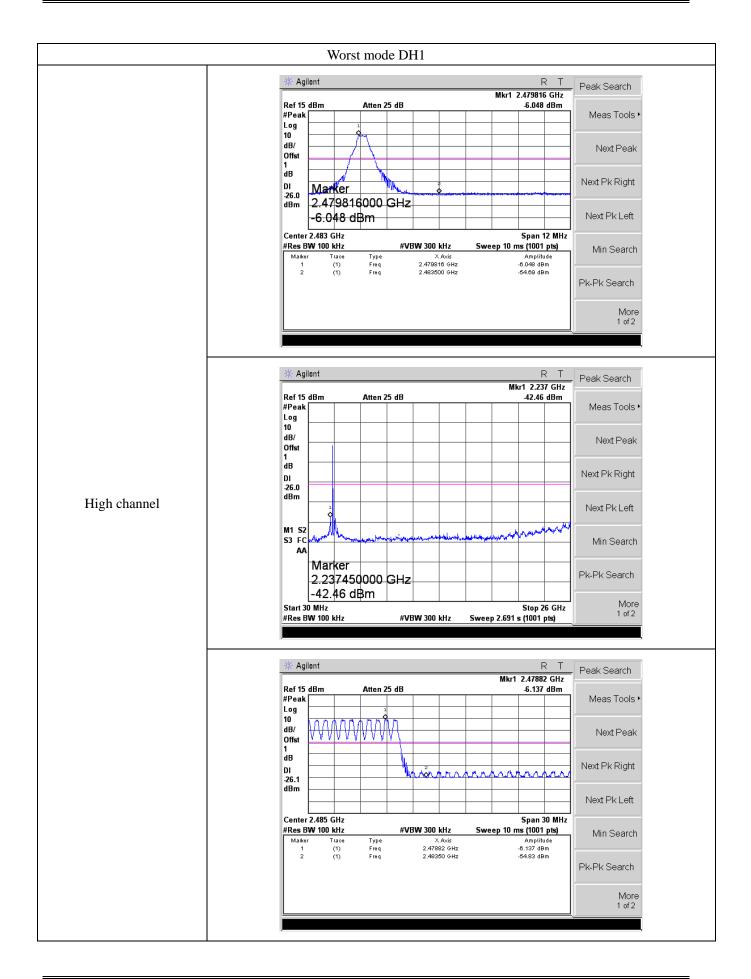














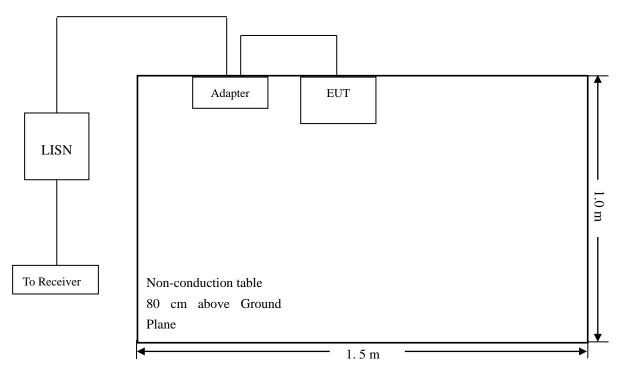
# 12. Conducted Emissions

#### **12.1 Test Procedure**

The setup of EUT is according with per ANSI C63.10-2013 measurement procedure. The specification used was with the FCC Part 15.207 Limit.

The external I/O cables were draped along the test table and formed a bundle 30 to 40 cm long in the middle. The spacing between the peripherals was 10 cm.

### 12.2 Basic Test Setup Block Diagram



# 12.3 Test Receiver Setup

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

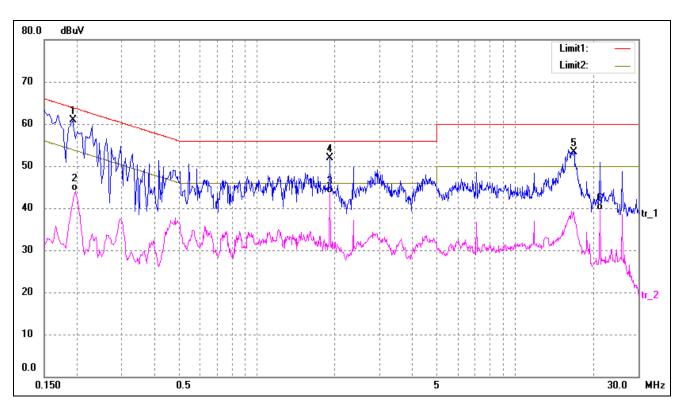
Start Frequency	150 kHz
Stop Frequency	30 MHz
Sweep Speed	Auto
IF Bandwidth	10 kHz
Quasi-Peak Adapter Bandwidth	9 kHz
Ouasi-Peak Adapter Mode	Normal

# 12.5 Summary of Test Results/Plots

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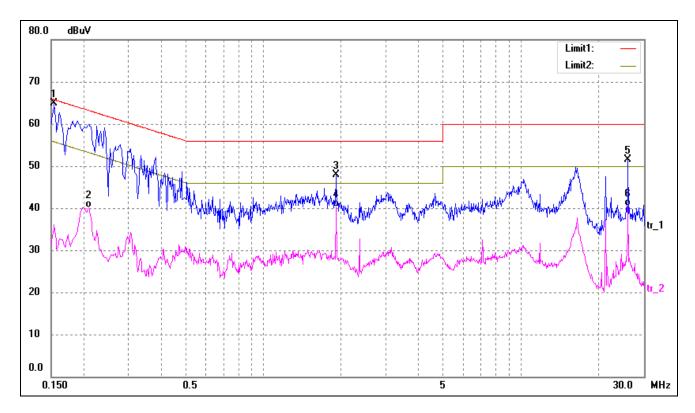




No.	Frequency	Reading	Correct	Result	Limit	Margin	Detector
	(MHz)	(dBuV)	(dB/m)	(dBuV)	(dBuV)	(dB)	
1	0.1940	50.73	10.12	60.85	63.86	-3.01	peak
2	0.1980	34.08	10.12	44.20	53.69	-9.49	AVG
3*	1.9180	32.98	10.60	43.58	46.00	-2.42	AVG
4	1.9220	41.34	10.60	51.94	56.00	-4.06	peak
5	16.8580	42.25	11.08	53.33	60.00	-6.67	peak
6	21.2820	28.24	11.19	39.43	50.00	-10.57	AVG







No.	Frequency	Reading	Correct	Result	Limit	Margin	Detector
	(MHz)	(dBuV)	(dB/m)	(dBuV)	(dBuV)	(dB)	
1*	0.1539	54.78	10.10	64.88	65.78	-0.90	peak
2	0.2100	30.06	10.13	40.19	53.20	-13.01	AVG
3	1.9180	37.27	10.60	47.87	56.00	-8.13	peak
4	1.9220	29.65	10.60	40.25	46.00	-5.75	AVG
5	26.0140	40.33	11.23	51.56	60.00	-8.44	peak
6	26.0140	29.25	11.23	40.48	50.00	-9.52	AVG

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