



FCC PART 15, SUBPART C ISEDC RSS-210, ISSUE 9, AUGUST 2016

TEST REPORT

For

Tyto Life LLC

411 Borel Avenue, Suite 100 San Mateo, CA 94402, USA

FCC ID: 2ALVS-OB100 IC: 22669-OB100

Report Type:

Original Report

Product Type:

Wireless Door Lock

Frank Wang

Troy Pandhumsoporn

Prepared By: Test Engineer

Report Number: R1706221-249

Report Date: 2017-08-17

Frank Wang

Reviewed By: RF Test Engineer

Bay Area Compliance Laboratories Corp.

1274 Anvilwood Avenue, Sunnyvale, CA 94089, USA

Tel: (408) 732-9162 Fax: (408) 732-9164

Note: This test report is prepared for the customer shown above and for the device described herein. It may not be duplicated or used in part without prior written consent from Bay Area Compliance Laboratories Corp. This report **must not** be used by the customer to claim product certification, approval, or endorsement by A2LA*, NIST, or any agency of the Federal Government.

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

TABLE OF CONTENTS

1 G	eneral Description	4
1.1	Product Description for Equipment Under Test (EUT)	4
1.2	Mechanical Description of EUT	4
1.3	Objective	4
1.4	Related Submittal(s)/Grant(s)	4
1.5	Test Methodology	4
1.6	Measurement Uncertainty	5
1.7	Test Facility Registrations	5
1.8	Test Facility Accreditations	5
2 Sy	ystem Test Configuration	8
2.1	Justification	8
2.2	EUT Exercise Software	8
2.3	Duty Cycle Correction Factor	8
2.4	Equipment Modifications	9
2.5	Local Support Equipment	9
2.6	Support Equipment	9
2.7	Interface Ports and Cabling	9
	ımmary of Test Results	
4 F(CC §15.203 and ISEDC RSS-Gen §8.3 - Antenna Requirements	11
4.1	Applicable Standards	
4.2	Antenna Description	
5 F(CC §15.215(c) and ISEDC RSS-Gen §6.6 -Emission Bandwidth	
5.1	Applicable Standards	
5.2	Measurement Procedure	
5.3	Test Equipment List and Details	
5.4	Test Environmental Conditions	14
5.5	Test Results	
6 F	CC §15.209, §15.249(a) (c) (d) (e) and ISEDC RSS-210 B.10, RSS-Gen §8.9, §8.10 - Radiated E	
6.1	Applicable Standards	
6.2	Test Setup	17
6.3	Test Procedure	
6.4	Corrected Amplitude and Margin Calculation	
6.5	Test Equipment List and Details	
6.6	Test Environmental Conditions	19
6.7	Summary of Test Results	19
6.8	Radiated Emissions Test Results	
7 Aı	nnex A (Informative) - A2LA Electrical Testing Certificate	23

DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R1706221-249	Original Report	2017-08-17

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test and measurement report was prepared on behalf of *Tyto Life LLC*, and their product model: *OB100*, FCC ID: 2ALVS-OB100, IC: 22669-OB100 or the "EUT" as referred to in this report. It is a wireless-enabled Door Lock with Wi-Fi, two Bluetooth Low Energy radios, and 5.8 GHz radar.

1.2 Mechanical Description of EUT

The EUT measures approximately 7 cm (L) x 10 cm (W) including locking mechanism (or 6.5 cm for cylinder width) x 10 cm (H) and weight 0.835 kg.

The test data gathered are from typical production sample, serial number: R1706221-01 assigned by BACL.

1.3 Objective

This report is prepared on behalf of *Tyto Life LLC* in accordance with Part 2, Subpart J, and Part 15, Subparts B and C of the Federal Communication Commission's rules and ISEDC RSS-210 Issue 9, August 2016.

The objective is to determine compliance with FCC Part 15.249 and ISEDC RSS-210 rules for: Radiated Emissions.

1.4 Related Submittal(s)/Grant(s)

FCC Part 15, Subpart C, Equipment DTS with FCC ID: 2ALVS-OB100; IC: 22669-OB100, Report number: R1706221-247

1.5 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices.

1.6 Measurement Uncertainty

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

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

1.7 Test Facility Registrations

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

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

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

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

1.8 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

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

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

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

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

- For the USA (Federal Communications Commission):
 - 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
 - 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
 - 3- All Telephone Terminal Equipment within FCC Scope C.
- For the Canada (Industry Canada):
 - 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
 - 2 All Scope 2-Licensed Personal Mobile Radio Services;
 - 3 All Scope 3-Licensed General Mobile and Fixed Radio Services;
 - 4 All Scope 4-Licensed Maritime and Aviation Radio Services;
 - 5 All Scope 5-Licensed Fixed Microwave Radio Services
 - 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.
- For Singapore (Info-Communications Development Authority (IDA)):
 - All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2
 - 2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2
- For the Hong Kong Special Administrative Region:
 - 1 All Radio Equipment, per KHCA 10XX-series Specifications;
 - 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
 - 3 All Fixed Network Equipment, per HKCA 20XX-series Specifications.
- For Japan:
 - 1 MIC Telecommunication Business Law (Terminal Equipment):
 - All Scope A1 Terminal Equipment for the Purpose of Calls;
 - All Scope A2 Other Terminal Equipment
 - 2 Radio Law (Radio Equipment):
 - All Scope B1 Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
 - All Scope B2 Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
 - All Scope B3 Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

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

- 1 Electronics and Office Equipment:
 - for Telephony (ver. 3.0)
 - for Audio/Video (ver. 3.0)
 - for Battery Charging Systems (ver. 1.1)
 - for Set-top Boxes and Cable Boxes (ver. 4.1)
 - for Televisions (ver. 6.1)
 - for Computers (ver. 6.0)
 - for Displays (ver. 6.0)
 - for Imaging Equipment (ver. 2.0)

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

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

- Australia: ACMA (Australian Communication and Media Authority) APEC Tel MRA -Phase I;
- Canada: (Industry Canada ISEDC) Foreign Certification Body FCB APEC Tel MRA -Phase I and Phase II;
- Chinese Taipei (Republic of China Taiwan):
 - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
 - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
 - o EMC Directive 2004/108/EC US-EU EMC and Telecom MRA CAB
 - Radio and Teleterminal Equipment (RandTTE) Directive 1995/5/EC US -EU EMC and Telecom MRA CAB
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority OFTA)
 APEC Tel MRA -Phase I and Phase II
- Israel US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Development Authority IDA) APEC Tel MRA -Phase I and Phase II;
- Japan: VCCI Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:
 - ENERGY STAR Recognized Test Laboratory US EPA
 - o Telecommunications Certification Body (TCB) US FCC;
- Vietnam: APEC Tel MRA -Phase I;

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013.

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

The worst-case data rates are determined to be as follows for each mode based upon investigation by measuring radiated emission across all data rates, bandwidths, and modulations.

2.2 EUT Exercise Software

The test firmware used was the CoolTerm serial terminal and Texas Instruments's BTool provided by *Tyto Life LLC*, the software is compliant with the standard requirements being tested against.

Modulation	Frequency (MHz)	Power Setting
RADAR	5785	default

2.3 Duty Cycle Correction Factor

According to KDB 558074 D01 DTS Meas Guidance v04 section 6.0:

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

Radio Mode	On Time (ms)	Period (ms)	Duty Cycle (%)	Duty Cycle Correction Factor (dB)
Radar	0.001667	0.2933	0.5683	22.45

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

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

2.4 Equipment Modifications

The radiated sample was fastened with masking tape to turn on the device for testing. (No permanent modifications made to the EUT.)

2.5 Local Support Equipment

N/A

2.6 Support Equipment

Manufacturer	Description	Model
ASUS	Laptop	X556UAM Signature Edition

2.7 Interface Ports and Cabling

Cable Description	Length (m)	То	From
Segger J-Link CortexM Adapter	< 1 m	Laptop	EUT
RF Cable Assembly (WFL- WFL) 70mm ultra	< 1 m	EUT	PSA
TRIPP-LITE Keyspan USB Serial Adapter + TLL Converter	< 1m	Laptop	EUT
Standard USB Adapter (2x)	< 1m	Laptop	EUT

3 Summary of Test Results

Results reported relate only to the product tested.

FCC and ISEDC Rules	Description of Test	Results
FCC §15.203 ISEDC RSS-Gen §8.3	Antenna Requirement	Compliant
FCC §15.207 ISEDC RSS-Gen §8.8	AC Power Line Conducted Emissions	N/A*
FCC §15.215(c) ISEDC RSS-247 §5.2 (1)	Emission Bandwidth	Compliant
FCC §2.1053, §15.205, §15.209, §15.249 (a)(c)(d)(e) ISEDC RSS-210 B.10(a)(b) ISEDC RSS-Gen §8.9 and §8.10	Radiated Emissions	Compliant

Note: Because the EUT uses CR123A battery, AC Power Line Conducted Emissions test is not required.

4 FCC §15.203 and ISEDC RSS-Gen §8.3 - Antenna Requirements

4.1 Applicable Standards

According to FCC §15.203:

An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this Section. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited.

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

According to ISEDC RSS-Gen §8.3: Transmitter Antenna

The applicant for equipment certification, as per RSP-100, must provide a list of all antenna types that may be used with the license-exempt transmitter, indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna.

License-exempt transmitters that have received equipment certification may operate with different types of antennas. However, it is not permissible to exceed the maximum equivalent isotopically radiated power (e.i.r.p.) limits specified in the applicable standard (RSS) for the license-exempt apparatus.

Testing shall be performed using the highest gain antenna of each combination of license-exempt transmitter and antenna type, with the transmitter output power set at the maximum level. ⁹ When a measurement at the antenna connector is used to determine RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna manufacturer.

User manuals for transmitters equipped with detachable antennas shall also contain the following notice in a conspicuous location:

This radio transmitter (identify the device by certification number) has been approved by Industry Canada to operate with the antenna types listed below with the maximum permissible gain indicated. Antenna types not included in this list, having a gain greater than the maximum gain indicated for that type, are strictly prohibited for use with this device.

Immediately following the above notice, the manufacturer shall provide a list of all antenna types approved for use with the transmitter, indicating the maximum permissible antenna gain (in dBi).

4.2 Antenna Description

The antennas used by the EUT are permanent attached antennas.

Antenna usage	Frequency Range (MHz)	Maximum Antenna Gain (dBi)
Proximity Sensor/Radar	5785	-3.45

5 FCC §15.215(c) and ISEDC RSS-Gen §6.6 -Emission Bandwidth

5.1 Applicable Standards

According to ECFR §15.215(c) Intentional radiators operating under the alternative provisions to the general emission limits, as contained in §§15.217 through 15.257 and in subpart E of this part, must be designed to ensure that the 20 dB bandwidth of the emission, or whatever bandwidth may otherwise be specified in the specific rule section under which the equipment operates, is contained within the frequency band designated in the rule section under which the equipment is operated. In the case of intentional radiators operating under the provisions of subpart E, the emission bandwidth may span across multiple contiguous frequency bands identified in that subpart. The requirement to contain the designated bandwidth of the emission within the specified frequency band includes the effects from frequency sweeping, frequency hopping and other modulation techniques that may be employed as well as the frequency stability of the transmitter over expected variations in temperature and supply voltage. If a frequency stability is not specified in the regulations, it 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.

According to RSS-Gen section 6.6, The emission bandwidth (×dB) is defined as the frequency range between two points, one above and one below the carrier frequency, at which the spectral density of the emission is attenuated × dB below the maximum in-band spectral density of the modulated signal. Spectral density (power per unit bandwidth) is to be measured with a detector of resolution bandwidth in the range of 1% to 5% of the anticipated emission bandwidth, and a video bandwidth at least 3× the resolution bandwidth.

When the occupied bandwidth limit is not stated in the applicable RSS or reference measurement method, the transmitted signal bandwidth shall be reported as the 99% emission bandwidth, as calculated or measured.

5.2 Measurement Procedure

The measurements are based on C63.10.

5.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Analyzer, Spectrum	E4446A	US44300386	2017-04-20	1 year
-	RF cable	-	-	Each time ¹	N/A
-	10dB attenuator	-	-	Each time ¹	N/A

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

Statement of Traceability: BACL Corp. attests that all calibrations have been performed per the A2LA requirements, traceable to the NIST.

5.4 Test Environmental Conditions

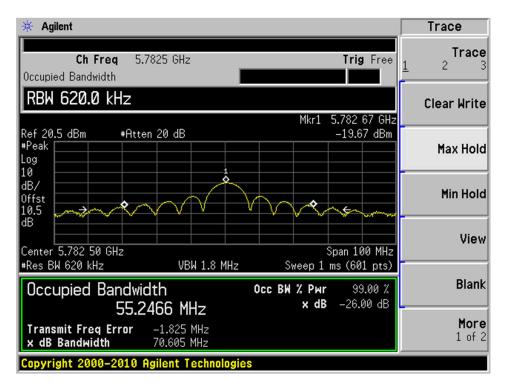
Temperature:	23° C
Relative Humidity:	42 %
ATM Pressure:	102.7 KPa

The testing was performed by Troy Pandhumsoporn on 2017-06-29 to 2017-06-30 in RF site.

5.5 Test Results

Compliance, 20 dB bandwidth is contained within the frequency band 5725-5850 MHz. And 99% emission bandwidth is 55.2466 MHz.

RADAR



6 FCC §15.209, §15.249(a) (c) (d) (e) and ISEDC RSS-210 B.10, RSS-Gen §8.9, §8.10 - Radiated Emissions

6.1 Applicable Standards

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

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

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

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

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

^{**} Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz.

However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

As per FCC §15.249 (a) Except as provided in paragraph (b) of this section, the field strength of emissions from intentional radiators operated within these frequency bands shall comply with the following:

Fundamental frequency	Field strength of fundamental (millivolts/meter)	Field strength of harmonics (microvolts/meter)	
902-928 MHz	50	500	
2400-2483.5 MHz	50	500	
5725-5875 MHz	50	500	
24.0-24.25 GHz	250	2500	

- (c) Field strength limits are specified at a distance of 3 meters.
- (d) Emissions radiated outside of the specified frequency bands, except for harmonics, shall be attenuated by at least 50 dB below the level of the fundamental or to the general radiated emission limits in §15.209, whichever is the lesser attenuation.
- (e) As shown in §15.35(b), for frequencies above 1000 MHz, the field strength limits in paragraphs (a) and (b) of this section are based on average limits. However, the peak field strength of any emission shall not exceed the maximum permitted average limits specified above by more than 20 dB under any condition of modulation.

As per ISEDC RSS-Gen 8.9,

Except when the requirements applicable to a given device state otherwise, emissions from licence-exempt transmitters shall comply with the field strength limits shown in Table 4 or Table 5 below. Additionally, the level of any transmitter emission shall not exceed the level of the transmitter's fundamental emission

Table 4 – General Field Strength Limits for Licence-Exempt Transmitters at Frequencies Above 30 MHz

Frequency (MHz)	Field Strength (μv/m at 3 metres)
30-88	100
88-216	150
216-960	200
Above 960*	500

^{*} Unless otherwise specified, for all frequencies greater than 1 GHz, the radiated emission limits for license-exempt radio apparatus stated in applicable RSSs (including RSS-Gen) are based on measurements using a linear average detector function having a minimum resolution bandwidth of 1 MHz. If an average limit is specified for the EUT, then the peak emission shall also be measured with instrumentation properly adjusted for such factors as pulse desensitization to ensure the peak emission is less than 20 dB above the average limit.

Note: Transmitting devices are not permitted in restricted frequency bands unless stated otherwise in the specific RSS.

As per ISEDC RSS-210 B.10 Bands 902-928 MHz, 2400-2483.5 MHz and 5725-5875 MHz Devices shall comply with the following requirements:

a. The field strength of fundamental and harmonic emissions, measured at 3 m, shall not exceed 50 mV/m and 0.5 mV/m respectively.

The field strength limits shall be measured using an average detector, except for the fundamental emission in the frequency band 902-928 MHz, which is based on measurements using an International Special Committee on Radio Interference (CISPR) quasi-peak detector.

b. Emissions radiated outside of the specified frequency bands, except for harmonic emissions, shall be attenuated by at least 50 dB below the level of the fundamental emissions or to the general field strength limits listed in RSS-Gen, whichever is less stringent.

The provisions of RSS-Gen regarding pulsed operation do not apply to CISPR measurement for the band 902-928 MHz.

6.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was the FCC 15 Subpart C and ISEDC RSS-247 limits.

The spacing between the peripherals was 10 centimeters.

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

6.3 Test Procedure

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

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

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

The spectrum analyzer or receiver was set as:

Below 1000 MHz:

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

Above 1000 MHz:

- (1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto
- (2) Average: RBW = 1MHz / VBW = 10Hz / Sweep = Auto

6.4 Corrected Amplitude and Margin Calculation

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

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

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

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

Margin = Corrected Amplitude - Limit

6.5 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde and Schwarz	Receiver, EMI Test	ESCI 1166.5950K03	100338	2016-02-04	2 years
Agilent	Analyzer, Spectrum	E4446A	US44300386	2017-04-20	1 year
Sunol Sciences	System Controller	SC99V	011003-1	N/R	N/A
Sunol Sciences	Antenna, Biconi-Log	JB1	A013105-3	2016-07-11	2 years
EMCO	Antenna, Horn	3115	9511-4627	2016-01-28	2 years
Agilent	Amplifier, Pre	8447D	2944A06639	2017-06-28	1 year
IW	AOBOR Hi frequency Co AX Cable	DC 1531	KPS- 1501A3960K PS	2016-08-05	1 year
-	SMA cable	-	C0002	Each time ¹	N/A
-	N-Type Cable	-	C00012	Each time ¹	N/A
-	N-Type Cable	-	C00014	Each time ¹	N/A
Agilent	Pre-Amplifier	8449B	3008A01978	2016-10-06	1 year
Sunol Sciences	Antenna, Horn	DRH-118	A052704	2017-03-27	2 years
A.R.A.	Antenna, Horn	DRG-118/A	1132	2015-09-21	2 years
Vasona	Test software	V6.0 build 11	10400213	N/R	N/R

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

Statement of Traceability: BACL attests that all calibrations have been performed per the A2LA requirements, traceable to NIST.

6.6 Test Environmental Conditions

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

The testing was performed by Frank Wang and Troy Pandhumsoporn 2017-07-03 to 2017-07-12 in 5m chamber 3.

6.7 Summary of Test Results

According to the data hereinafter, the EUT <u>complied with FCC Title 47, Part 15C and ISEDC RSS-247</u> standard's radiated emissions limits, and had the worst margin of:

RADAR

Mode: Transmitting				
Margin Frequency (dB) (MHz)		Polarization (Horizontal/Vertical)	channel	
-19.86	17355	Vertical	N/A	

Co-Location: Outer-Inner-BLE, RADAR

Mode: Transmitting				
Margin Frequency (dB) (MHz)		Polarization (Horizontal/Vertical)	channel	
-9.23	9920	Horizontal	Outer: ch39, Inner: ch20	

Co-Location: Wi-Fi, Outer-BLE, RADAR

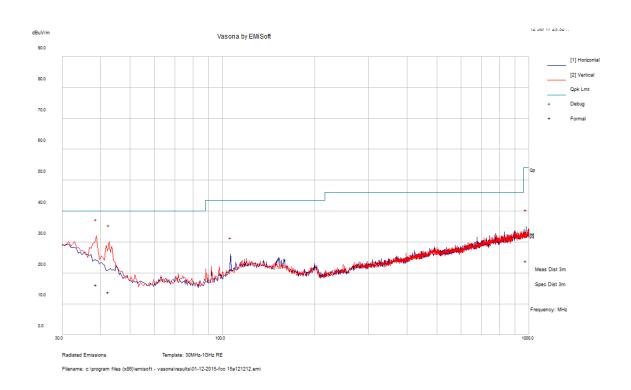
Mode: Transmitting			
Margin Frequency (dB) (MHz)		Polarization (Horizontal/Vertical)	channel
-8.10	9920	Horizontal	Outer: ch39

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

6.8 Radiated Emissions Test Results

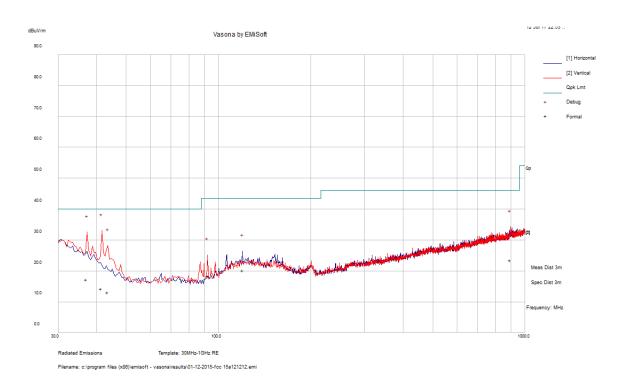
1) 30 MHz – 1 GHz Worst Case, Measured at 3 meters

2.4 GHz Wi-Fi, 2.4 GHz Outer-BLE, 5.8 GHz Radar Co-Location Testing



Frequency (MHz)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Comment
38.71325	16.3	312	V	173	40	-23.7	QP
42.38575	13.82	392	V	4	40	-26.18	QP
106.3935	21.01	124	Н	232	43.5	-22.49	QP
977.432	23.9	388	Н	32	54	-30.1	QP

2.4 GHz Inner-BLE, 2.4 GHz Outer-BLE, 5.8 GHz Radar Co-Location Testing



Frequency (MHz)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Comment
41.42725	14.38	355	V	252	40	-25.62	QP
37.06775	17.29	233	V	34	40	-22.71	QP
894.7388	23.55	144	V	257	46	-22.45	QP
43.402	13.05	351	V	20	40	-26.95	QP
119.9728	20.27	188	Н	241	43.5	-23.23	QP
92.29875	18.54	126	V	159	43.5	-24.96	QP

2) 1-40 GHz Measured at 3 meters

Radar Mode

Frequency (MHz) Reading Azimuth	Turntable	Test Antenna			Cable	Cable Pre-	Cord.	FCC/ISEDC			
		Azimuth (degrees)	Height (cm)	Polarity (H/V)	Factor (dB/m)	Loss (dB)	Amp. (dB)	Reading (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Comments
5785 MHz											
5785	67.23	300	300	Н	33.61	9.36	36.20	74.00	113.98	-39.98	PK
5785	71.94	19	212	V	33.61	9.36	36.20	78.71	113.98	-35.27	PK
5460	43.50	0	100	Н	33.49	9.36	36.13	50.22	74.00	-23.78	PK
5460	43.20	0	100	V	33.49	9.36	36.13	49.92	74.00	-24.08	PK
11570	39.25	0	100	V	35.16	16.12	38.21	52.32	74.00	-21.68	PK
17355	40.02	0	100	V	32.88	19.45	38.21	54.14	74.00	-19.86	PK

Frequency (MHz)	Test Antenna Polarity	Peak Reading (dBµV/m)	Duty Cycle ¹ (%)	Duty Cycle Correction Factor ² (dB)	Average Level ³ (dBµV/m)	Limit (dBµV/m)	Margin (dB)
5785	Н	74.00	0.5683	22.45	51.55	93.98	-42.43
5785	V	78.71	0.5683	22.45	56.26	93.98	-37.72
5460	Н	50.22	0.5683	22.45	27.77	54.00	-26.23
5460	V	49.92	0.5683	22.45	27.47	54.00	-26.53
11570	V	52.32	0.5683	22.45	29.87	54.00	-24.13
17355	V	54.14	0.5683	22.45	31.69	54.00	-22.31

Note¹: Please refer to Section 2.2 of this report for the device duty cycle measurement.

Note²: Duty Cycle Correction Factor (dB) = 10*log (1/Duty Cycle)

Note³: According to Section 7.5 of ANSI C63.10-2013, Average Level = Peak Reading – Duty Cycle Correction Factor.

Note⁴: Please refer to R18706221-247 report section 7 Radiated Emissions for the Co-Location spurious radiated emission test result.

7 Annex A (Informative) - A2LA Electrical Testing Certificate



Accredited Laboratory

A2LA has accredited

BAY AREA COMPLIANCE LABORATORIES CORP.

Sunnyvale, CA

for technical competence in the field of

Electrical Testing

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005
General requirements for the competence of testing and calibration laboratories. This laboratory also meets the requirements of A2LA R222 - Specific Requirements - EPA ENERGY STAR Accreditation Program. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communiqué dated 8 January 2009).



Report Number: R1706221-249

Presented this 30th day of August 2016.

Senior Director of Quality & Communications For the Accreditation Council

Certificate Number 3297.02 Valid to September 30, 2018

For the tests to which this accreditation applies, please refer to the laboratory's Electrical Scope of Accreditation.

---END OF REPORT ---