









TEST REPORT

Test report no.: 1-6369/18-03-04

DAKKS
Deutsche
Akrediterungsstelle
D-P-12076-01-03

BNetzA-CAB-02/21-102

Testing laboratory

CTC advanced GmbH

Untertuerkheimer Strasse 6 – 10
66117 Saarbruecken / Germany
Phone: + 49 681 5 98 - 0
Fax: + 49 681 5 98 - 9075
Internet: http://www.ctcadvanced.com
e-mail: mail@ctcadvanced.com

Accredited Testing Laboratory:

The testing laboratory (area of testing) is accredited according to DIN EN ISO/IEC 17025 (2005) by the Deutsche Akkreditierungsstelle GmbH (DAkkS)

The accreditation is valid for the scope of testing procedures as stated in the accreditation certificate with

the registration number: D-PL-12076-01-03

Applicant

Oticon A/S

Kongebakken 9

2765 Smørum / DENMARK
Phone: +45 39 17 71 00
Contact: Ole Myrtue
e-mail: olmy@oticon.com
Phone: +45 39 13 77 44

Manufacturer

Oticon A/S

Kongebakken 9

2765 Smørum / DENMARK

Test standard/s

FCC - Title 47 CFR FCC - Title 47 of the Code of Federal Regulations; Chapter I; Part 15 - Radio

Part 15 frequency devices

RSS - 210 Issue 9 Spectrum Management and Telecommunications Radio Standards Specification -

Licence-Exempt Radio Apparatus: Category I Equipment

For further applied test standards please refer to section 3 of this test report.

Test Item

Kind of test item: Hearing Aid

Model name: Oticon BTE UP

FCC ID: U280TBTEUP

IC: 1350B-OTBTEUP

Frequency: 3.84 MHz
Technology tested: Proprietary

Antenna: Integrated antenna

Power supply: 1.1 V to 1.4 V DC by power supply

Temperature range: 0°C to +40°C

This test report is electronically signed and valid without handwritten signature. For verification of the electronic signatures, the public keys can be requested at the testing laboratory.

Test report authorized:	Test performed:		
	p.o.		
Christoph Schneider	Sumit Kumar		
Lab Manager	Testing Manager		
Radio Communications & EMC	Radio Communications & EMC		



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2 General information

2.1 Notes and disclaimer

The test results of this test report relate exclusively to the test item specified in this test report. CTC advanced GmbH does not assume responsibility for any conclusions and generalizations drawn from the test results with regard to other specimens or samples of the type of the equipment represented by the test item.

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2.2 Application details

Date of receipt of order: 2018-12-10
Date of receipt of test item: 2019-01-16
Start of test: 2019-01-18
End of test: 2019-01-18

Person(s) present during the test: -/-

2.3 Test laboratories sub-contracted

None

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3 Test standard/s and references

Test standard	Date	Description
FCC - Title 47 CFR Part 15	-/-	FCC - Title 47 of the Code of Federal Regulations; Chapter I; Part 15 - Radio frequency devices
RSS - 210 Issue 9	August 2016	Spectrum Management and Telecommunications Radio Standards Specification - Licence-Exempt Radio Apparatus: Category I Equipment
RSS - Gen Issue 5	April 2018	Spectrum Management and Telecommunications Radio Standards Specification - General Requirements for Compliance of Radio Apparatus

Guidance	Version	Description
ANSI C63.4-2014 ANSI C63.10-2013	-/-	American national standard for methods of measurement of radio- noise emissions from low-voltage electrical and electronic equipment in the range of 9 kHz to 40 GHz American national standard of procedures for compliance testing of unlicensed wireless devices

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4 Test environment

Temperature	emperature :		+22 °C during room temperature tests +40 °C during high temperature tests 0 °C during low temperature tests
Relative humidity content	:		46 %
Barometric pressure	:		1021 hpa
Power supply :		V _{nom} V _{max} V _{min}	1.4 V DC by power supply 1.4 V 1.1 V

5 Test item

5.1 General description

Kind of test item :	:	Hearing Aid
Type identification :	:	Oticon BTE UP
HMN :	:	-/-
PMN :		Oticon BTE UP
HVIN :	:	Oticon BTE UP
FVIN :	:	-/-
S/N serial number :	:	-/-
Hardware status :	:	-/-
Software status :	:	-/-
Firmware status :	:	-/-
Frequency band :	:	3.84 MHz
Type of radio transmission: Use of frequency spectrum:		Modulated carrier
Type of modulation :	:	ASK
Number of channels :	:	1
Antenna :	:	Integrated antenna
Power supply :	:	1.1 V to 1.4 V DC by power supply
Temperature range :	:	0°C to +40°C

5.2 Additional information

The content of the following annexes is defined in the QA. It may be that not all of the listed annexes are necessary for this report, thus some values in between may be missing.

Test setup and EUT photos are included in test report: 1-6369/18-03-01_AnnexA

1-6369/18-03-01_AnnexB 1-6369/18-03-01_AnnexF

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6 Description of the test setup

Typically, the calibrations of the test apparatus are commissioned to and performed by an accredited calibration laboratory. The calibration intervals are determined in accordance with the DIN EN ISO/IEC 17025. In addition to the external calibrations, the laboratory executes comparison measurements with other calibrated test systems or effective verifications. Weekly chamber inspections and range calibrations are performed. Where possible, RF generating and signaling equipment as well as measuring receivers and analyzers are connected to an external high-precision 10 MHz reference (GPS-based or rubidium frequency standard).

In order to simplify the identification of the equipment used at some special tests, some items of test equipment and ancillaries can be provided with an identifier or number in the equipment list below (Lab/Item).

Agenda: Kind of Calibration

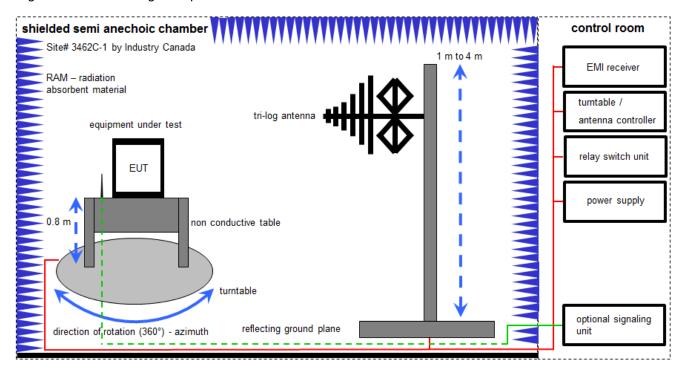
k ne	calibration / calibrated not required (k, ev, izw, zw not required)	EK zw	limited calibration cyclical maintenance (external cyclical maintenance)
ev	periodic self verification	izw	internal cyclical maintenance
Ve	long-term stability recognized	g	blocked for accredited testing
vlkl!	Attention: extended calibration interval		
NK!	Attention: not calibrated	*)	next calibration ordered / currently in progress

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6.1 Shielded semi anechoic chamber

The radiated measurements are performed in vertical and horizontal plane in the frequency range from 30 MHz to 1 GHz in semi-anechoic chambers. The EUT is positioned on a non-conductive support with a height of 0.80 m above a conductive ground plane that covers the whole chamber. The receiving antennas are conform to specifications ANSI C63. These antennas can be moved over the height range between 1.0 m and 4.0 m in order to search for maximum field strength emitted from EUT. The measurement distances between EUT and receiving antennas are indicated in the test setups for the various frequency ranges. For each measurement, the EUT is rotated in all three axes until the maximum field strength is received. The wanted and unwanted emissions are received by spectrum analyzers where the detector modes and resolution bandwidths over various frequency ranges are set according to requirement ANSI C63.



Measurement distance: tri-log antenna 10 meter

EMC32 software version: 10.30.0

FS = UR + CL + AF

(FS-field strength; UR-voltage at the receiver; CL-loss of the cable; AF-antenna factor)

Example calculation:

 $FS \left[dB\mu V/m \right] = 12.35 \left[dB\mu V/m \right] + 1.90 \left[dB \right] + 16.80 \left[dB/m \right] = 31.05 \left[dB\mu V/m \right] (35.69 \ \mu V/m)$

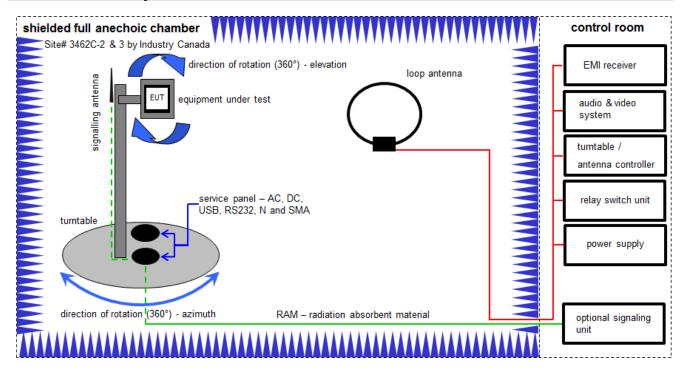
Equipment table:

No.	Lab / Item	Equipment	Туре	Manufacturer	Serial No.	INV. No.	Kind of Calibration	Last Calibration	Next Calibration
1	Α	Switch-Unit	3488A	HP	2719A14505	300000368	ev	-/-	-/-
2	А	DC power supply, 60Vdc, 50A, 1200 W	6032A	HP	2920A04466	300000580	ne	-/-	-/-
3	Α	Meßkabine 1	HF-Absorberhalle	MWB AG 300023	-/-	300000551	ne	-/-	-/-
4	Α	Antenna Tower	Model 2175	ETS-Lindgren	64762	300003745	izw	-/-	-/-
5	А	Positioning Controller	Model 2090	ETS-Lindgren	64672	300003746	izw	-/-	-/-
6	А	Turntable Interface- Box	Model 105637	ETS-Lindgren	44583	300003747	izw	-/-	-/-
7	А	TRILOG Broadband Test-Antenna 30 MHz - 3 GHz	VULB9163	Schwarzbeck Mess - Elektronik	371	300003854	vIKI!	24.11.2017	23.11.2020
8	Α	EMI Test Receiver	ESCI 3	R&S	100083	300003312	k	12.12.2018	11.12.2019

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6.2 Shielded fully anechoic chamber



Measurement distance: loop antenna 3 meter / 1 meter

FS = UR + CA + AF

(FS-field strength; UR-voltage at the receiver; CA-loss of the signal path; AF-antenna factor)

Example calculation:

 $FS [dB\mu V/m] = 40.0 [dB\mu V/m] + (-35.8) [dB] + 32.9 [dB/m] = 37.1 [dB\mu V/m] (71.61 \mu V/m)$

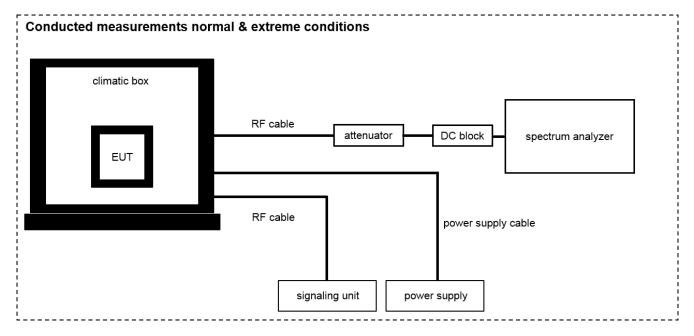
Equipment table:

No.	Lab / Item	Equipment	Туре	Manufacturer	Serial No.	INV. No.	Kind of Calibration	Last Calibration	Next Calibration
1	Α	Active Loop Antenna 9 kHz to 30 MHz	6502	EMCO	2210	300001015	vIKI!	07.07.2017	06.07.2019
2	Α	Anechoic chamber	FAC 3/5m	MWB / TDK	87400/02	300000996	ev	-/-	-/-
3	Α	Switch / Control Unit	3488A	HP	*	300000199	ne	-/-	-/-
4	Α	EMI Test Receiver 20Hz- 26,5GHz	ESU26	R&S	100037	300003555	k	14.09.2018	13.12.2019
5	Α	4U RF Switch Platform	L4491A	Agilent Technologies	MY50000037	300004509	ne	-/-	-/-
6	А	NEXIO EMV- Software	BAT EMC V3.16.0.49	EMCO	-/-	300004682	ne	-/-	-/-
7	Α	PC	ExOne	F+W	-/-	300004703	ne	-/-	-/-

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6.3 Conducted measurements normal and extreme conditions



OP = AV + CA

(OP-output power; AV-analyzer value; CA-loss signal path)

Example calculation:

OP [dBm] = 6.0 [dBm] + 11.7 [dB] = 17.7 [dBm] (58.88 mW)

Equipment table:

No.	Lab / Item	Equipment	Туре	Manufacturer	Serial No.	INV. No.	Kind of Calibration	Last Calibration	Next Calibration
1	Α	DC Power Supply, 60V, 10A	6038A	HP	3122A11097	300001204	vIKI!	12.12.2017	11.12.2020
2	Α	Signal- and Spectrum Analyzer	FSW26	R&S	101455	300004528	k	19.12.2018	18.12.2019
3	Α	RF-Cable SRD021 No. 8	Enviroflex 316 D	Huber & Suhner	-/-	400001318	ev	-/-	-/-
4	A.	Climatic Box	VT 4011	Voetsch Industrietechnik	5856623060001 0	300005363	ev	07.05.2018	06.05.2020

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7 Sequence of testing

7.1 Sequence of testing radiated spurious 9 kHz to 30 MHz

Setup

- The equipment is set up to simulate normal operation mode as described in the user manual or defined by the manufacturer.
- If the EUT is a tabletop system, it is placed on a table with 0.8 m height.
- If the EUT is a floor standing device, it is placed directly on the turn table.
- Auxiliary equipment and cables are positioned to simulate normal operation conditions as described in ANSI C 63.4.
- The AC power port of the EUT (if available) is connected to a power outlet below the turntable.
- Measurement distance is 3 m (see ANSI C 63.4) see test details.
- EUT is set into operation.

Premeasurement*

- The turntable rotates from 0° to 315° using 45° steps.
- The antenna height is 1 m.
- At each turntable position the analyzer sweeps with positive-peak detector to find the maximum of all emissions.

Final measurement

- Identified emissions during the pre-measurement are maximized by the software by rotating the turntable from 0° to 360°.
- Loop antenna is rotated about its vertical axis for maximum response at each azimuth about the EUT.
 (For certain applications, the loop antenna plane may also need to be positioned horizontally at the specified distance from the EUT)
- The final measurement is done in the position (turntable and elevation) causing the highest emissions with quasi-peak (as described in ANSI C 63.4).
- Final levels, frequency, measuring time, bandwidth, turntable position, correction factor, margin to the limit and limit will be recorded. A plot with the graph of the premeasurement and the limit is stored.

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^{*)}Note: The sequence will be repeated three times with different EUT orientations.



7.2 Sequence of testing radiated spurious 30 MHz to 1 GHz

Setup

- The equipment is set up to simulate normal operation mode as described in the user manual or defined by the manufacturer.
- If the EUT is a tabletop system, a table with 0.8 m height is used, which is placed on the ground plane.
- If the EUT is a floor standing device, it is placed on the ground plane with insulation between both.
- Auxiliary equipment and cables are positioned to simulate normal operation conditions as described in ANSI C 63.4.
- The AC power port of the EUT (if available) is connected to a power outlet below the turntable.
- Measurement distance is 10 m or 3 m (see ANSI C 63.4) see test details.
- EUT is set into operation.

Premeasurement

- The turntable rotates from 0° to 315° using 45° steps.
- The antenna is polarized vertical and horizontal.
- The antenna height changes from 1 m to 3 m.
- At each turntable position, antenna polarization and height the analyzer sweeps three times in peak to find the maximum of all emissions.

Final measurement

- The final measurement is performed for at least six highest peaks according to the requirements of the ANSI C63.4.
- Based on antenna and turntable positions at which the peak values are measured the software maximize the peaks by changing turntable position ± 45° and antenna height between 1 and 4 m.
- The final measurement is done with quasi-peak detector (as described in ANSI C 63.4).
- Final levels, frequency, measuring time, bandwidth, antenna height, antenna polarization, turntable angle, correction factor, margin to the limit and limit are recorded. A plot with the graph of the premeasurement with marked maximum final results and the limit is stored.

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8 Measurement uncertainty

Measurement uncertainty						
Test case	Uncertainty					
Occupied bandwidth	± used RBW					
Field strength of the fundamental	± 3 dB					
Field strength of the harmonics and spurious	± 3 dB					
Receiver spurious emissions and cabinet radiations	± 3 dB					
Conducted limits	± 2.6 dB					

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9 Summary of measurement results

\boxtimes	No deviations from the technical specifications were ascertained
	There were deviations from the technical specifications ascertained
	This test report is only a partial test report. The content and verdict of the performed test cases are listed below.

TC Identifier	Description	Verdict	Date	Remark
RF-Testing	CFR Part 15 RSS Gen Issue 5 RSS 210 Issue 9	See table	2019-05-17	-/-

Test Specification Clause	Test Case	Temperature Conditions	Power Source Voltages	С	NC	NA	NP	Remark
§ 15.223(a) RSS 210 Issue 9 (B.3)	Fieldstrength of Fundamental	Nominal	Nominal	\boxtimes				-/-
§ 15.223(a) RSS 210 Issue 9 (B.3)	Emission bandwidth 6 dB bandwidth	Nominal	Nominal	-/-	-/-	-/-	-/-	-/-
RSS Gen Issue 5 (6.6)	Occupied bandwidth 99 % bandwidth	Nominal	Nominal					-/-
§ 15.209/ RSS Gen Issue 5 (6.13)	Fieldstrength of harmonics and spurious	Nominal	Nominal	\boxtimes				-/-
§ 15.209 RSS Gen Issue 5 (7.1)	Receiver spurious emissions (radiated)	Nominal	Nominal			\boxtimes		-/-
§15.107 §15.207	Conducted limits	Nominal	Nominal					-/-

Note: NA = Not Applicable; NP = Not Performed, C = Compliant; NC = Not compliant

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10 Additional comments

Reference documents: None

Special test descriptions: We perform the radiated pre-scans in different spherical positions and

consolidate the results in one result plot. The test procedure includes scans in the theta axes every 90° and in phi axes @ 0° and 90° for both polarizations

vertical & horizontal or magnetic emissions.

Configuration descriptions: None

Additional information: None

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11 Measurement results

11.1 Field strength of the fundamental

Measurement:

Measurement parameter			
Detector:	Quasi peak		
Sweep time:	-/-		
Resolution bandwidth:	9 kHz		
Video bandwidth:	≥ RBW		
Span:	-/-		
Trace-Mode:	Max Hold		
Used test setup:	See chapter 6.2 A		
Measurement uncertainty:	See chapter 8		

Limits:

FCC	IC

The field strength of any emission within the band 1.705-10.0 MHz shall not exceed 100 microvolts/meter at a distance of 30 meters. However, if the bandwidth of the emission is less than 10% of the center frequency, the field strength shall not exceed 15 microvolts/meter or (the bandwidth of the device in kHz) divided by (the center frequency of the device in MHz) microvolts/meter at a distance of 30 meters, whichever is the higher level

Recalculation:

According to ANSI C63.10					
Frequency	Formula Correction value				
3.84 MHz	$FS_{limit} = FS_{max} - 40 \log \left(\frac{d_{nearfield}}{d_{measure}}\right) - 20 \log \left(\frac{d_{limit}}{d_{nearfield}}\right)$ is the calculation of field strength at the limit distance, expressed in dBµV/m is the measured field strength, expressed in dBµV/m is the measured field strength, expressed in dBµV/m is the distance of the measurement point from EUT dlimit is the reference limit distance	-32.3 from 3m to 30m			

Results:

Test conditions		Radiated field strength / (dBµV/m)			
Frequency			3.84 MHz		
Mo	Mode		at 30 m distance	Limit at 30 m distance	
T _{nom}	V _{nom}	46.30	14.00	34.81	

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11.2 Emission bandwidth (6 dB bandwidth)

Measurement:

Measurement parameters			
Detector:	Peak		
Resolution bandwidth:	1 % – 5 % of the occupied bandwidth		
Video bandwidth:	≥ 3x RBW		
Trace mode:	Max hold		
Used test setup:	See chapter 6.3 A		
Measurement uncertainty:	See chapter 8		

Limits:

FCC	
For the purposes of this Section, bandwidth is determined at the points 6 dB do	wn from the modulated carrier

Results:

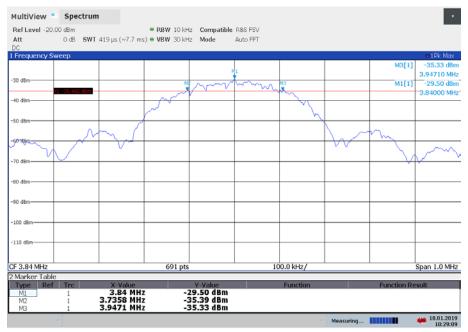
Test conditions		6 dB bandwidth
Frequency		3.84 MHz
T _{nom}	V _{nom}	211.3 kHz

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Plots:

Plot 1: 6 dB bandwidth



10:29:10 18.01.2019

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11.3 Occupied bandwidth (99% bandwidth)

Measurement:

Measurement parameters			
Detector:	Peak		
Resolution bandwidth:	1 % – 5 % of the occupied bandwidth		
Video bandwidth:	≥ 3x RBW		
Trace mode:	Max hold		
Analyser function:	99 % power function		
Used test setup:	See chapter 6.3 A		
Measurement uncertainty:	See chapter 8		

Limits:

IC
-/-

Results:

Test co	onditions	99 % bandwidth
Frequency		
T _{nom}	V _{nom}	374.14 kHz

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Plots:

Plot 1: 99% bandwidth



10:27:34 18.01.2019

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11.4 Field strength of the harmonics and spurious

Measurement:

Measurement parameter				
Detector:	Average / Quasi Peak			
Sweep time:	Auto			
Resolution bandwidth:	F < 150 kHz: 200 Hz 150 kHz > F > 30 MHz: 9 kHz 9 kHz F > 30 MHz: 120 kHz			
Video bandwidth:	F < 150 kHz: 1 kHz 150 kHz > F > 30 MHz: 100 kHz 9 kHz F > 30 MHz: 300 kHz			
Span:	See plots!			
Trace-Mode:	Max hold			
Used test setup:	See chapter 6.1 A & 6.2 A			
Measurement uncertainty:	See chapter 8			

Limits:

FCC		IC		
Field strength of the harmonics and spurious.				
Frequency / (MHz)	Field strength / (μV/m)		Measurement dista	nce / (m)
0.0009 - 0.490	2400/F	2400/F(kHz)		
0.490 - 1.705	24000/F	24000/F(kHz)		
1.705 – 30	30 (29.5 dBμV/m)		30	
30 – 88	100 (40 dBμv/m)		3	
88 – 216	150 (43.5 dBµV/m)		3	
216 – 960	200 (46 dBμV/m)		3	

Result:

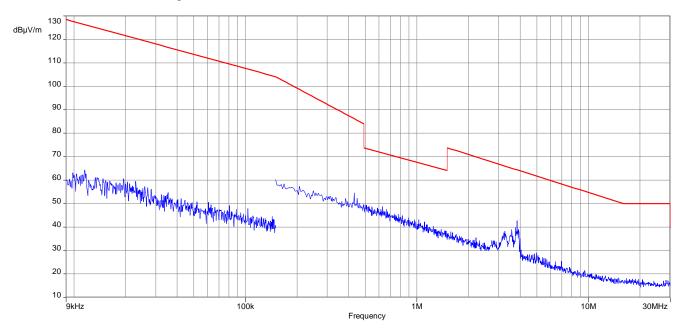
	Spurious emissions					
f / (MHz)	Detector	Limit max. allowed / (dBµV/m)	Amplitude of emission / (dBµV/m)	Results		
	No Spurious emissions detected.					

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Plots: TX mode

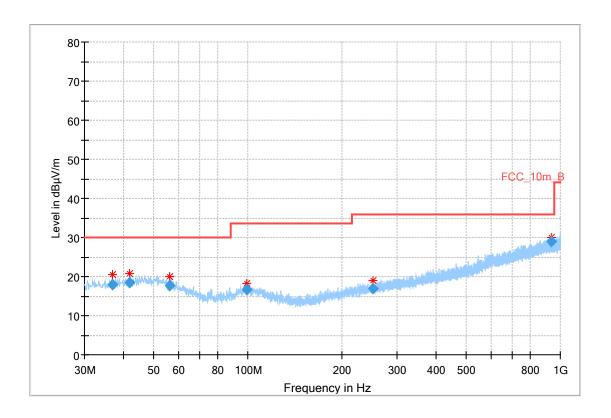
Plot 1: 9 kHz - 30 MHz; magnetic



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Plot 2: 30 MHz – 1000 MHz, vertical and horizontal polarization



Final_Result

Frequency (MHz)	QuasiPeak (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB/m)
36.789	17.92	30.0	12.08	1000	120	101.0	Н	133.0	14
41.816	18.40	30.0	11.60	1000	120	160.0	٧	18.0	15
56.138	17.82	30.0	12.18	1000	120	160.0	Н	324.0	14
99.290	16.64	33.5	16.86	1000	120	98.0	٧	282.0	13
250.823	16.96	36.0	19.04	1000	120	160.0	٧	211.0	14
936.799	29.08	36.0	6.92	1000	120	160.0	٧	211.0	24

12 Observations

No observations except those reported with the single test cases have been made.

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Annex A Glossary

EUT	Equipment under test				
DUT	Device under test				
UUT	Unit under test				
GUE	GNSS User Equipment				
ETSI	European Telecommunications Standards Institute				
EN	European Standard				
FCC	Federal Communications Commission				
FCC ID	Company Identifier at FCC				
IC	Industry Canada				
PMN	Product marketing name				
HMN	Host marketing name				
HVIN	Hardware version identification number				
FVIN	Firmware version identification number				
EMC	Electromagnetic Compatibility				
HW	Hardware				
SW	Software				
Inv. No.	Inventory number				
S/N or SN	Serial number				
С	Compliant				
NC	Not compliant				
NA	Not applicable				
NP	Not performed				
PP	Positive peak				
QP	Quasi peak				
AVG	Average				
ОС	Operating channel				
ocw	Operating channel bandwidth				
OBW	Occupied bandwidth				
ООВ	Out of band				
DFS	Dynamic frequency selection				
CAC	Channel availability check				
OP	Occupancy period				
NOP	Non occupancy period				
DC	Duty cycle				
PER	Packet error rate				
CW	Clean wave				
MC	Modulated carrier				
WLAN	Wireless local area network				
RLAN	Radio local area network				
DSSS	Dynamic sequence spread spectrum				
OFDM	Orthogonal frequency division multiplexing				
FHSS	Frequency hopping spread spectrum				
GNSS	Global Navigation Satellite System				
C/N ₀	Carrier to noise-density ratio, expressed in dB-Hz				

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Annex B Document history

Version	Applied changes	Date of release
-/-	Initial release	2019-05-17

Annex C Accreditation Certificate

first page	last page
Deutsche Akkreditierungsstelle GmbH Entrusted according to Section 8 subsection 1 AkkStelleG in connection with Section 1 subsection 1 AkkStelleGBV Signatory to the Multilateral Agreements of EA, ILAC and IAF for Mutual Recognition Accreditation The Deutsche Akkreditierungsstelle GmbH attests that the testing laboratory CTC advanced GmbH Untertürkhelmer Straße 6-10, 66117 Saarbrücken Is competent under the terms of DIN EN ISO/IEC 17025:2005 to carry out tests in the following fields: Telecommunication	Deutsche Akkreditierungsstelle GmbH Office Berlin Spittelmarkt 10 10117 Berlin G0327 Frankfurt am Main G0ffice Braunschweig Bundesallee 100 38116 Braunschweig Bundesallee 100 38116 Braunschweig The publication of extracts of the accreditation certificate is subject to the prior written approval by Deutsche Akkreditierungsstelle GmbH (Dakks). Exempted is the unchanged form of separate diszeminations of the cover sheet by the conformity assessment body mentioned overfeaf. No impression shall be made that the accreditation also extends to fields beyond the scope of accreditation attested by Dakks.
The accreditation certificate shall only apply in connection with the notice of accreditation of 02.06.2017 with the accreditation number D-PL-12076-01 and is valid until 21.04.2021. It comprises the cover sheet, the reverse side of the cover sheet and the following annex with a total of 43 pages. Registration number of the certificate: D-PL-12076-01-03	The accreditation was granted pursuant to the Act on the Accreditation Book/RASSelBeQ of 31, July 2009 (Federal Law Gazette Jr. 2053) and the Regulation (EQ No PS6/2008) of the European Parliament and of the Council of 9 July 2008 setting out the requirements for accreditation and market surveillance relating to the marketing of products (Official Journal of the European Indon 1.218 of 9 July 2008, p. 30), DAMS is a signatory to the Mutilateral Agreements for Mutual Recognition of the European co-operation for Accreditation (EA), International Laboratory Accreditation Cooperation (EA). The signatories to these agreements recognise each other's accreditations. The up-to-date state of membership can be retrieved from the following websites: EA: www.uropean-accreditation.org ILAC: www.llac.org ILAF: www.llac.org
Frankfurt, 02.06.2027 Display (174) in a plane visible of Obelian States	

Note: The current certificate annex is published on the website (link see below) of the Accreditation Body DAkkS or may be received by CTC advanced GmbH on request

https://www.dakks.de/as/ast/d/D-PL-12076-01-03.pdf

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