Project 17510

Model TM500-315

Wireless Certification Report

Prepared for:

TowMate 15827 Serenity Point Lane Rogers, Arkansas 72756 By

Professional Testing (EMI), Inc. 1601 North A.W. Grimes Blvd., Suite B Round Rock, Texas 78665

21 Dec 2015

Reviewed by

Larry Finn Chief Technology Officer Written by

Eric Lifsey EMC Engineer

Revision History

| Revision Number | Description | Date |
|------------------------|-------------------------------|-------------|
| 00 | Initial draft. | 21 Dec 2015 |
| 01 | Revised with product details. | 21 Dec 2015 |
| | | |
| | | |

Corrections

In all cases where the model appears at 315 MHz Wireless Towlight or similar it represents the model TM500-315.

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Certificate of Compliance

| Applicant | Device & Test Identification | |
|-------------------------------|------------------------------|----------------|
| TowMate (William Anderson) | FCC ID: | UZVTM315 |
| 15827 Serenity Point Lane | Industry Canada ID: | Not Applicable |
| Rogers, Arkansas 72756 | Model(s): | TM500-315 |
| Certificate Date: 21 Dec 2015 | Laboratory Project ID: | 17510 |

The device model(s) listed above were tested utilizing the following documents and found to be in compliance with the required criteria.

| 47 CFR (USA) Industry Canada RSS-210 & RSS-Gen | | | |
|--|-------------------------------|--|--|
| Section Reference FCC IC | Parameter | | |
| 15.231(a) RSS-210 Is. 8 A1.1, Table A | Fundamental Field Strength | | |
| 15.231(a) RSS-210 Is. 8 A1.1, Table A | Harmonic & Spurious Emissions | | |
| 15.231(a)(1) RSS-210 Is. 8 A1.1.1 | Maximum Transmit Time | | |
| 15.231(c) RSS-210 ls. 8 A1.1.3 | Bandwidth | | |
| 15.203 RSS-Gen Is. 3 | Antenna Requirements | | |

I, Eric Lifsey, for Professional Testing (EMI), Inc., being familiar with the above rules and test procedures have reviewed the test setup, measured data, and this report. I believe them to be true and accurate.

Eric Lifsey EMC Engineer

This report has been reviewed and accepted by the Applicant. The undersigned is responsible for ensuring that this device will continue to comply with the rules listed above.

D. C.A. I'

Representative of Applicant

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1.0 Introduction

1.1 Scope

This report describes the extent to which the equipment under test (EUT) conformed to the intentional radiator requirements of North America.

Professional Testing (EMI), Inc., (PTI) follows the guidelines of National Institute of Standards and Technology (NIST) for all uncertainty calculations, estimates, and expressions thereof for electromagnetic compatibility testing. The procedures of ANSI C63.4: 2009 were used for making all radiated enclosure and mains emission measurements.

1.2 EUT Description

This device is part of a wireless extension of the rear signal lights of a towing vehicle. It will be used in multiple products by the manufacturer on a limited-modular basis; it is not intended for sale to other parties.

Table 1.2.1: Equipment Under Test

| Manufacturer | Model | Serial # | Description |
|--------------|-----------|----------|-------------|
| TowMate | TM500-315 | None | Transmitter |

The device is composed of an approximately square circuit board 3.3 x 4.3 cm and typically housed in a rigid plastic case or in a plastic connector of the style used to connect a towed vehicle to the towing vehicle. As tested it was circuit board only. The device only transmits when it receives power; it has no receive mode.

In operation the device is activated/powered by the usual rear signal lights from the towing vehicle and transmits this information to a separate device attached to the towed vehicle and replicates the light signals for other traffic to observe. When no vehicle lamps are powered, the transmitter is also not powered.

1.3 EUT Operation

The EUT was exercised in a manner consistent with normal operations.

1.4 Modifications to Equipment

The EUT transmit power was reduced, and duty cycle extended, during the performance of the test program.

1.5 Radiated Measurement Calculation

Raw Measured Level + Antenna Factor + Cable Losses - Amplifier Gain = Corrected Level

When measurement distance differs from the specified limit distance the correct extrapolation factor is applied.

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2.0 Applicable Documents and Clauses

| Table 2.0.1: Applicable Documents | | |
|-----------------------------------|---|--|
| Document | Title/Description | |
| 47 CFR (USA) | Part 15 – Section 15.231 | |
| ANSI C63.4 2009 | American National Standard for Methods of Measurement of Radio-Noise | |
| ANSI C05.4 2009 | Emissions from Low Voltage Electrical and Electronic Equipment | |
| RSS-Gen Issue 3 | General Requirements and Information for the Certification of Radio Apparatus | |
| RSS-210 Issue 8 | Licence-exempt Radio Apparatus (All Frequency Bands): | |
| K22-510 ISSUE 9 | Category I Equipment | |

| Table 2.0.2: Applicable Clauses | | | |
|--|-------------------------------|--|--|
| 47 CFR (USA) Industry Canada RSS-210 & RSS-Gen | | | |
| Section Reference FCC IC | Parameter | | |
| 15.231(a) RSS-210 A1.1, Table A | Fundamental Field Strength | | |
| 15.231(a) RSS-210 A1.1, Table A | Harmonic & Spurious Emissions | | |
| 15.231(a)(1) RSS-210 A1.1.1 | Maximum Transmit Time | | |
| 15.231(c) RSS-210 A1.1.3 | Bandwidth | | |
| 15.203 RSS-Gen | Antenna Requirements | | |

| Table 2.0.3: Supplemental Statements | | | |
|--------------------------------------|----------------|--|--|
| Section Number FCC | | | |
| Section Number | Clause Subject | Statement | |
| IC | | | |
| FCC 15.231(a)(3) | Periodic | The EUT makes no periodic transmission and is strictly activated by the vehicle lighting/indicator including brake and turn signals. | |
| RSS-210 A1.1.1(c) | Transmissions | Transmission only occurs while the lights are engaged and ceases immediately when light power is removed. | |

2.1 Test Site

Measurements were made at the PTI semi-anechoic facility designated Site 45 (FCC 459644, IC 3036B-1) in Austin, Texas. The site is registered with the FCC under Section 2.948 and Industry Canada per RSS-GEN, and is subsequently confirmed by laboratory accreditation (NVLAP). The test site is located at 11400 Burnet Road, Austin, Texas 78758, while the main office is located at 1601 North A.W. Grimes Boulevard, Suite B, Round Rock, Texas, 78665.

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3.0 Fundamental Field Strength

3.1 Test Procedure

EUT is placed on a non-conductive surface 80 cm above a reference plane and measurements of emissions are made to find maximum emission level.

3.2 Test Criteria

| Section Reference FCC IC | Parameter | Date(s) |
|----------------------------|--|-------------|
| 15.231(a) RSS210 A1.1 | Frequency 315.0 MHz Radiated Output Power, 10,333.33μV/m @ 3 m Restated as 80.28 dBμV/m @ 3 m Or extrapolated as 69.8 dBμV/m @ 10 m | 14 Dec 2015 |

3.3 Test Results

| Table 3.3.1: Field Strength at 10 Meters | | | | |
|--|---------------------|--|------------------|--|
| Frequency MHz | Antenna Polarity | Corrected Level (Measured Peak Level) dBµV/m | Detector Mode | |
| 315 | V | 80.94 | Peak | |
| 315 | Н | 81.40 | Peak | |

Resolution bandwidth 120 kHz. Video bandwidth 120 kHz. Detector mode is peak.

Duty cycle is such that the emission average level is calculated from the duty cycle factor applied to the measured peak level.

| Table 3.3.2: Corrected Field Strength | | | | |
|---|---|----------------------------|---------------------------------------|--------------|
| Limit At 10 meters dBµV/m (Average Detection) | Maximum Corrected Level (Measured Peak Level) dBµV/m | Duty Cycle Factor dB | Calculated Average Level dBµV/m | Margin dB |
| 65.17 | 81.4 | -19.82 | 61.58 | -3.59 |

The EUT was found to be in compliance with the applicable criteria.

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4.0 Transmitter Duty Cycle and Shutoff Time

4.1 Test Procedure

EUT is placed into normal transmit operation to observe and record transmitter time domain performance.

4.2 Test Criteria

Measurement is based on intervals not to exceed 100 msec. Maximum transmitter on time is divided by the lesser of 100 msec or the actual measured minimum transmitter interval time. The result is converted to dB and applied as needed to peak measurements of transmitter artifacts to determine average power. This is not a pass/fail measurement.

| Section Reference FCC IC | Parameter | Date(s) |
|------------------------------|-------------------------------------|-------------|
| 15.231(a)(1) RSS210 A1.1.1 | Maximum Transmit Time Duty Cycle | 14 Dec 2015 |

4.3 Test Results

| Table 4.3.1 Duty Cycle Results and Average Duty Cycle Factor Result | | | | | | | | | |
|---|--|---|----------------|---|--|--|--|--|--|
| Measured On Time (msec) | Measured Time Interval (msec) | Duty Cycle Factor Calculation | Result (dB) | Duty Cycle Factor Allowed (dB) | | | | | |
| 8.28 | 81.125 | = 20 * Log ₁₀ (8.28 msec / 81.125 msec) | -19.82 | -19.82 | | | | | |

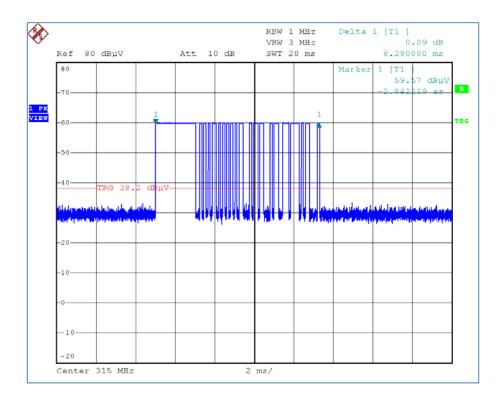
| Table 4.3.2 Exposure Source Duty Cycle Results | | | | | | | | | |
|--|--|---|----------------|---|--|--|--|--|--|
| Measured On Time (msec) | Measured Time Interval (msec) | Exposure Duty Cycle Factor Calculation | Result (dB) | Duty Cycle Factor Allowed (dB) | | | | | |
| 8.28 | 81.125 | = 10 * Log ₁₀ (8.28 msec / 81.125 msec) | -9.91 | -9.91 | | | | | |

| Table 4.3.3: Maximum Transmit Shutoff Time, Limit and Measured | | | | | | | |
|--|--|--|--|--|--|--|--|
| Limit Transmit Time | Maximum Measured Transmit Time | | | | | | |
| 5 seconds | Transmission ends immediately as all power is removed when all vehicle light signals stop functioning. | | | | | | |

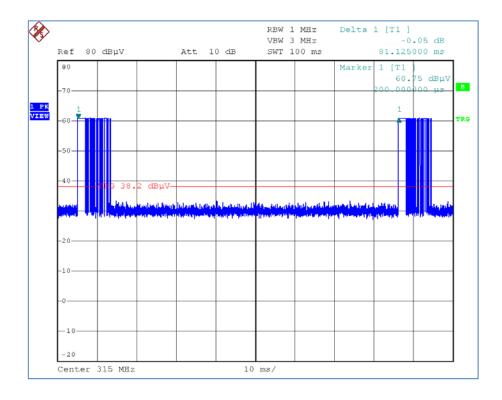
See plotted results of duty cycle time appear below.

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4.3.1 Transmitter On Time



4.3.2 Transmitter Period



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5.0 Occupied Bandwidth

5.1 Test Procedure

The EUT is configured for best signal/power and the bandwidth then is measured. A recording of the results is included.

5.2 Test Criteria

| Section Reference FCC IC | Parameter | Date(s) |
|-----------------------------------|------------------|-------------|
| 15.231(c), 2.1049 RSS210 A1.1.3 | Bandwidth, 20 dB | 15 Dec 2015 |

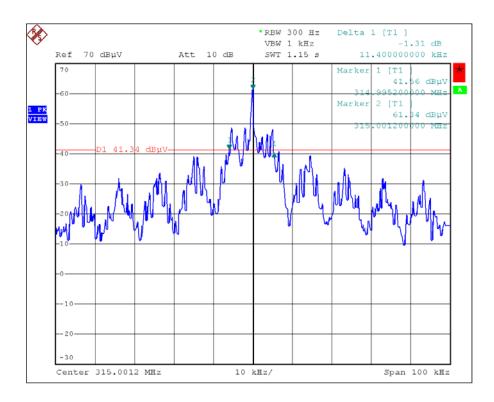
5.3 Test Results

| Table 5.3.1: Bandwidth Limit and Measurement | | | | | | | |
|---|--------------------------|--|--|--|--|--|--|
| Limit 15.231(c) 20 dB BW For Fundamental = 315 MHz 0.25% of Fundamental kHz | Measured BW 20 dB kHz | | | | | | |
| 0.0025 · 315.0 = 787.5 | 11.4 | | | | | | |

EUT was found to be in compliance with applicable requirements.

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5.3.1 Bandwidth Plot



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6.0 Radiated Spurious Emissions

6.1 Test Procedure

The EUT was placed on a non-conductive table 0.8 meters above the ground plane. The table was centered on a rotating turntable at a distance of 1 meter from the measurement antenna.

Spurious emissions below 1 GHz were measured with quasi-peak detection with a resolution bandwidth of 120 kHz. A diagram showing the test setup is given in the figure below.

Harmonic emissions above 1 GHz peak were measured with peak detection, a resolution bandwidth of 1 MHz, and at a distance of 3 meters. If peak measurements exceeded average limits, the peak limit was applicable and duty cycle factor was then applied for average level calculation. Emissions were investigated up to at least the 10th harmonic of the transmitter fundamental.

Non-harmonic spurious emissions must satisfy the average limit and the peak limit (20 dB above average).

6.2 Test Criteria

| Section Number FCC IC | Clause Subject | Date |
|--|--|-------------|
| 15.231(a), 15.209 RSS-210 A1.1 Table A | Field Strength of Radiated Spurious/Harmonic Emissions | 14 Dec 2015 |

6.3 Test Results

Emissions were measured in peak detection mode. All recorded emissions were harmonics of the fundamental. For each emission the average duty cycle factor (-19.82 dB) would apply. Therefore, the emissions must remain under the peak limit of $85~dB\mu V/m$ to also satisfy the average limit. All emissions remained under the peak and therefore under the average limits.

The EUT satisfied the criteria. Recorded data is presented below.

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6.3.1 Below 1 GHz, Vertical Polarity

| | | | Profes | sional Te | sting, EN | ∕II, Inc. | | | | | |
|---|---|-------------------------------|-------------------------------|-----------------------------------|---------------------------------|--------------------------------|--|---|-----------------|----------|--------|
| Test Meth | ıod: | | | ds of Measurer e Range of 9 kH | | | | | • | | d |
| In accorda | ance with: | FCC Part 15 Limits | 209 - Code of | Federal Regulat | ions Part 47, S | Subpart C - Int | entional | Radiator | s, Radiate | ed Emiss | sions |
| Section: | | 15.209 | | | | | | | | | |
| Test Date | (s): | 12/14/20: | .5 | | EUT Serial | # : | N/A | | | | |
| Customer | : | | (TowMate) | | EUT Part #: | | 0 | | | | |
| Project N | | 17510-15 | | | Test Techni | | Eric Life | | | | |
| Purchase | | 0 | | | Supervisor: | | Lisa Ar | ndt | | | |
| Equip. Un | der Test: | 315 MHz \ | Vireless Tow | /light | Witness' N | ame: | None | | | | |
| | | Radiated E | nissions Test | t Results Data | Sheet | | | Page: | 1 | of | 1 |
| EUT | Line Voltage | : | 14 VDC | | EUT Pow | er Frequen | су: | 0 | N/A | | |
| Anten | na Orientatio | on: | Vertic | al | Frequ | ency Range: | | 30 | MHz to | 1GHz | |
| | EUT N | ∕lode of Op | eration: | | | | Transı | mit | | | |
| Frequency Measured (MHz) | | EUT Direction (Degrees) | Antenna Height (Meters) | Detector Function | Recorded Amplitude (dBµV) | Corrected Level (dBµV/m) | Limit Le | | /largin (dB) | Test R | esults |
| 30.3142 | 10 | 81 | 3.43 | Quasi-peak | 24 | 12.573 | 29.5 | 5 | -16.9 | Pa | ISS |
| 59.0488 | 10 | 11 | 3.58 | Quasi-peak | 31.4 | 13.299 | 29.5 | | -16.2 | Pa | SS |
| 630.27 | 10 | 144 | 1.93 | Quasi-peak | 22.1 | 20.316 | 35.6 | 5 | -15.3 | Pa | ISS |
| Radiate 30MH: 100 90 80 80 100 100 100 100 100 100 100 100 | essional Testing, ed Emissions, 10m D z - 1GHz Vertical F | istance | I Emissions | | | | asi-peak Lin Fret Led Qua K Limit Le Frected Pea- Fret Led Rr Yerifica mt 15,231 | mit Leye Ist-peak Rea Yek-Jup Prit UP Rea atton Limit Peak | ndi | SSIDNAL | |
| Heeld Streen 30 and 10 | or: Eric Lifsey | x x | 100M | Free Fransmitting | quency | | | Hz Towlight | | 10 | C. |

Dark red line is average limit of 15.231; green line is peak limit assuming 20 dB duty cycle factor.

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6.3.2 Below 1 GHz, Horizontal Polarity

| | | | | Profess | sional Te | sting, EN | VII, Inc. | | | | | |
|--|---|--|---|--|----------------------|--|---|---|---|----------------|---------|--------|
| Test Method: ANSI C63.4–2003: "Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz" (incorporated by reference, see §15.38). | | | | | | | | | d | | | |
| In accord | lance with: | FCC Part | t 15.20 | 9 - Code of I | ederal Regulat | ions Part 47, S | Subpart C - Inte | entional | Radiat | ors, Radiato | ed Emis | sions |
| Section: | | 15.209 | | | | | | | | | | |
| Test Dat | e(s): | 12/14/ | 2015 | | | EUT Serial | <u>#: </u> | N/A | | | | |
| Custome | er: | 4L-Des | ign (To | owMate) | | EUT Part #: | | 0 | | | | |
| Project I | | 17510- | ·15 | | | Test Techni | | Eric Life | | | | |
| | Order #: | 0 | | | | Supervisor: | | Lisa Ar | ndt | | | |
| Equip. U | nder Test: | 315 MI | Hz Wir | reless Tow | light | Witness' Na | ame: | None | | | | |
| | | Radiate | d Emis | sions Test | Results Data | Sheet | | | Page | e: 1 | of | 1 |
| EU. | Γ Line Voltag | e: | 14 | VDC | | EUT Pow | er Frequenc | :y: | 0 | N/A | | |
| Ante | nna Orientat | on: | | Horizon | ntal | Freque | ency Range: | | 3 | 0MHz to | 1GHz | |
| | EUT | Mode of | Opera | ation: | | | | Transı | mit | | | |
| Frequence Measure (MHz) | - | EU1 Directi (Degre | ion | Antenna Height (Meters) | Detector Function | Recorded Amplitude (dBµV) | Corrected Level (dBµV/m) | Limit Le (dBμV/ | | Margin (dB) | Test R | esults |
| 39.187 | 9 10 | 33 | | 1.25 | Quasi-peak | 24 | 6.898 | 29.5 | 5 | -22.6 | Pa | iss |
| 58.905 | 10 | 326 | ŝ | 1.37 | Quasi-peak | 23.1 | 5.024 | 29.5 | 5 | -24.5 | Pa | ISS |
| 630.21 | 3 10 | 78 | | 1.53 | Quasi-peak | 33.8 | 32.109 | 35.6 | 5 | -3.5 | Pa | ISS |
| Radi | fessional Testing ated Emissions, 10m Hz - 1GHz Horizon | Distance | | Emissions | | | — Quas | i-peak Lin ected Qua Limit Lea ected Pea fied Low-P F Verifica L 12-721 | nit Level Si-peak R Velyalue Repalue I Gook | | SIONAL | |
| 100 | | | - | | | | | 1_13,231_1 | Cak | | | |
| 90 (m 80 70 | | | | | | | | | | | _ | |
| ngth (dB v/m) 20 20 20 20 20 20 20 20 20 20 | | | | | | | | | | X | | |
| Field Stre | | | | | | | | | | | | |
| 를 30 | × | × | | | | | | | | 1 | | |
| E 20 | Way | | - | | | | The second second | | | | | |
| 10 | | Manage of the Party of the Part | Annual Printers and Administration in which the Party of | The state of the last of the l | | Address to the State of the Sta | | | | | | |
| 0 [±] 30N | I ator: Eric Lifsey | <u>" </u> | - | 100M | Free | uency | EU | T: 315 MI | Hz Towli | ght | 16 | ř |
| Oper | | | | | | | | | | | | |

Dark red line is average limit of 15.231; green line is peak limit assuming 20 dB duty cycle factor.

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6.3.3 Above 1 GHz, Vertical Polarity

| | | | Profess | sional Te | esting, El | MI, Inc. | | | |
|-----------------------------------|--|-------------------------------|---|--|---------------------------------|--|---|--|-----------------------------|
| Test Metho | d: | | | | ment of Radio Hz to 40 GHz" | | | • | |
| In accordar | ce with: | FCC Part 15. Limits | 209 - Code of I | ederal Regula | ations Part 47, | Subpart C - Int | entional Radi | ators, Radiato | ed Emissions |
| Section: | | 15.209 | | | | | | | |
| Test Date(s |): | 12/14/201 | | | EUT Serial | | N/A | | |
| Customer: | | 4L-Design | (TowMate) | | EUT Part #: | | 0 | | |
| Project Nur | | 17510-15 | | | Test Techn | | Eric Lifsey | | |
| Purchase O | | 0 | | | Supervisor | | Lisa Arndt | | |
| quip. Und | er Test: | 315 MHz V | Vireless Tow | light | Witness' N | ame: | None | | |
| | F | Radiated En | nissions Test | Results Da | ta Sheet | | Pa | ge: 1 | of 1 |
| EUT Li | ne Voltage | : 1 | L4 VDC | | EUT Pov | ver Frequen | cy: | N/A | |
| Antenna | Orientatio | n: | Vertic | al | Frequ | ency Range: | | Above 1 | GHz |
| | EUT N | /lode of Op | eration: | | | | Transmit | | |
| Frequency Measured (MHz) | Test Distance (Meters) | EUT Direction (Degrees) | Antenna Height (Meters) | Detector Function | Recorded Amplitude (dBµV) | Corrected Level (dBµV/m) | Limit Level (dBµV/m) | Margin (dB) | Test Results |
| 1261.76 | 3 | 229 | 1 | Peak | 44.7 | 32.604 | 74.0 | -41.4 | Pass |
| 1571.47 | 3 | 275 | 1 | Peak | 44.5 | 33.557 | 74.0 | -40.4 | Pass |
| 1888.84 | 3 | 323 | 1 | Peak | 43.9 | 34.481 | 74.0 | -39.5 | Pass |
| 1261.76 | 3 | 229 | 1 | Average | 34.3 | 22.164 | 54.0 | -31.8 | Pass |
| 1571.47 | 3 | 275 | 1 | Average | 35.6 | 24.624 | 54.0 | -29.3 | Pass |
| 1888.84 | 3 | 323 | 1 | Average | 34.1 | 24.719 | 54.0 | -29.2 | Pass |
| Radiated | ional Testing, Emissions, 3m Dis Vertical Polarity | | ns | | | → Ave | erage Limit Level reffed Average R Limit Level Refference Greak Read reffed Feak Read III-12-731 Peak R HORNY P&k | | SIONAL |
| 30 | t hardware and southern a | Market Market Market | hal a district has a group of a last of the | the design of the second of th | Address of the Assert Agency | a de contrata de la contrata del contrata del contrata de la contrata del contrata de la contrata de la contrata del contrata de la contrata de la contrata de la contrata de la contrata del contrat | i yaye ili asarta sarinci is <mark>il</mark> i asarani sa | and the state of t | the detection of the second |
| 20 [±] 1G Operator | : Eric Lifsey | | | Fre | equency | E | CUT: 315 MHz Tov | vlight | 4G |

Detector mode peak. Resolution bandwidth 1 MHz. Video bandwidth 3 MHz.

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6.3.4 Above 1 GHz, Horizontal Polarity

| | | | Profess | sional Te | sting, El | VII, Inc. | | | |
|--|---|-------------------------------|-------------------------------|----------------------------------|---------------------------------|---|--|-------------------|--------------|
| Test Metho | d: | | | ds of Measure e Range of 9 kH | | | | • | |
| In accordan | ice with: | FCC Part 15.2 Limits | 209 - Code of I | ederal Regula | tions Part 47, S | Subpart C - Int | entional Radia | ators, Radiate | ed Emissions |
| Section: | | 15.209 | | | , | | - | | |
| Test Date(s |): | 12/14/201 | | | EUT Serial | | N/A | | |
| Customer: | | 4L-Design (| TowMate) | | EUT Part #: | | 0 | | |
| Project Nur | | 17510-15 | | | Test Techn | | Eric Lifsey | | |
| Purchase O | | 0 | | | Supervisor: | | Lisa Arndt | | |
| Equip. Und | er Test: | 315 MHz W | /ireless Tow | light | Witness' N | ame: | None | | |
| | R | Radiated Em | issions Test | Results Dat | a Sheet | | Pa | ge: 1 | of 1 |
| EUT Li | ne Voltage: | 1 | 4 VDC | | EUT Pow | er Frequen | cy: (| N/A | |
| Antenna | Orientatio | n: | Horizor | ntal | Frequ | ency Range: | | Above 1 | GHz |
| | EUT N | lode of Ope | eration: | | | | Transmit | | |
| Frequency Measured (MHz) | Test Distance (Meters) | EUT Direction (Degrees) | Antenna Height (Meters) | Detector Function | Recorded Amplitude (dBμV) | Corrected Level (dBµV/m) | Limit Level (dBµV/m) | Margin (dB) | Test Results |
| 1266.36 | 3 | 89 | 1 | Peak | 43.9 | 31.784 | 74.0 | -42.2 | Pass |
| 1572.23 | 3 | 272 | 1 | Peak | 44.5 | 33.499 | 74.0 | -40.5 | Pass |
| 1877.58 | 3 | 242 | 1 | Peak | 42.4 | 32.906 | 74.0 | -41.1 | Pass |
| 1266.36 | 3 | 89 | 1 | Average | 33.9 | 21.789 | 54.0 | -32.2 | Pass |
| 1572.23 | 3 | 272 | 1 | Average | 35 | 24.018 | 54.0 | -29.9 | Pass |
| 1877.58 | 3 | 242 | 1 | Average | 34 | 24.471 | 54.0 | -29.5 | Pass |
| Radiated 1-6GHz I 90 80 (m// ngp) 418 (m// ngp) 60 60 60 60 60 60 60 60 60 60 60 60 60 | sional Testing, Emissions, 3m Dist Horizontal Polarit | | ions | | | → Ave → Point → Poi | rage Limit Level Terfied Average R Terfied Yeak Read ill 13:731 Peak R HORW P.K. | eading ing PROFES | SIONAL |
| 30 20 1G Operator 17510_12 | : Eric Lifsey 1415_RE02_Spurio AM, Monday, Dec | | Mode: T Power: 1 2.05k | ransmitting | quency | P | CUT: 315 MHz Tov roject Number: 17 lient: TowMate | - | 4G |

Detector mode peak. Resolution bandwidth 1 MHz. Video bandwidth 3 MHz.

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7.0 Antenna Construction Requirements

7.1 Procedure

A direct examination of the antenna construction is performed and compared to rule criteria that prevents wireless device antennas from being modified by end users in ways that would void their authorization to use the device.

7.2 Criteria

| Section Number FCC IC | Clause Subject | Date |
|-------------------------|----------------------|-------------|
| 15.203 RSS-Gen | Antenna Construction | 18 Dec 2015 |

7.3 Results

Antenna Manufacturer, Details

Manufactured by:

TowMate

Antenna is a fixed length of insulated wire soldered directly to the circuit

Length = 23.5 cm

board.

No external connector.

The antenna is not subject to user replacement or substitution.

The antenna design satisfies the requirements of the rules.

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8.0 Equipment Lists

8.1 Equipment for Fundamental Power and Spurious Radiated Emissions

| Professional Testing, EMI, Inc. | | | | | | | | | | | |
|---------------------------------|---|--|-------------|--|--|--|--|--|--|--|--|
| Test Method: | oise Emissions from Low-Voltage | | | | | | | | | | |
| | Electrical and Electronic Equipm | Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz" (incorporated by reference, | | | | | | | | | |
| | FCC Part 15.209 - Code of Federal Regulations Part 47, Subpart C - Intentional Radiators, | | | | | | | | | | |
| In accordance with: | Radiated Emissions Limits | Radiated Emissions Limits | | | | | | | | | |
| Section: | 15.209 | | | | | | | | | | |
| Test Date(s): | 12/14/2015 | EUT Serial #: | N/A | | | | | | | | |
| Customer: | 4L-Design (TowMate) | EUT Part #: | 0 | | | | | | | | |
| Project Number: | 17510-15 | Test Technician: | Eric Lifsey | | | | | | | | |
| Purchase Order #: | 0 | Supervisor: | Lisa Arndt | | | | | | | | |
| Equip. Under Test: | 315 MHz Wireless Towlight | Witness' Name: | None | | | | | | | | |

Radiated Emissions Test Equipment List

Tile! Software Version: 4.2.A, May 23, 2010, 08:38:52 AM

Test Profile: 2015 Rad Emissions_ClassA - LowPRF_072715.til or 2015 Rad Emissions_ClassB - LowPRF_072715.til

| Asset # Manufacturer N | | Model | Equipment Nomenclature | Serial Number | Calibration Due Date | | | | |
|------------------------|--------------|------------------------------|--|----------------|-------------------------|--|--|--|--|
| 1509A | Braden | N/A | TDK 10M Chamber, NSA < 1 GHz | DAC-012915-005 | 2/5/2016 | | | | |
| 1890 | HP | 8447F | Preamp/Amp, 9kHz-1300MHz, 28/25dB | 1 3313A05298 I | | | | | |
| 1937 | Agilent | E4440A | Spectrum Analyzer, 3 Hz - 26.5 GHz | MY44303298 | 1/2/2016 | | | | |
| 1926 | ETS-Lindgren | 3142D | Antenna, Biconilog, 26 MHz - 6 GHz | 135454 | 1/25/2017 | | | | |
| C027D | none | RG214 | Cable Coax, N-N, 25m | none | 10/1/2016 | | | | |
| 1327 | EMCO | 1050 | Controller, Antenna Mast | none | N/A | | | | |
| 0942 | EMCO | 11968D | Turntable, 4ft. | 9510-1835 | N/A | | | | |
| 1969 | HP | 11713A | Attenuator/Switch Driver | 3748A04113 | N/A | | | | |
| | | | | | | | | | |
| 1509B | Braden | N/A | TDK 10M Chamber, VSWR > 1 GHz | DAC-012915-005 | 3/13/2016 | | | | |
| 2004 | Miteq | AFS44-00101800- 2S-10P-44 | Amplifier, 40dB, .1-18GHz | 0 | 12/29/2015 | | | | |
| C030 | none | none | Cable Coax, N-N, 30m | none | 10/1/2016 | | | | |
| 1325 | EMCO | 1050 | Controller, Antenna Mast | 9003-1461 | N/A | | | | |
| 1780 | ETS-Lindgren | 3117 | Antenna, Double Ridged Guide Horn, 1 - 18 GHz | 110313 | 2/25/2017 | | | | |

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8.2 Equipment for Timings and Bandwidth

| Asset # | Manufacturer | Model # | Description | Calibration Due |
|---------|-----------------|---------|--------------------|--------------------|
| None | PTI | None | SMA Sleeve Antenna | Not Required |
| ALN-077 | Rohde & Schwarz | FSP-30 | Spectrum Analyzer | 16 Dec 2016 |

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Appendix: Policy, Rationale, and Evaluation of EMC Measurement Uncertainty

All uncertainty calculations, estimates and expressions thereof shall be in accordance with NIST policy. Since PTI operates in accordance with NIST (NVLAP) Handbook 150-11: 2007, all instrumentation having an effect on the accuracy or validity of tests shall be periodically calibrated or verified traceable to national standards by a competent calibration laboratory. The certificates of calibration or verification on this instrumentation shall include estimates of uncertainty as required by NIST Handbook 150-11.

1. Rationale and Summary of Expanded Uncertainty.

Each piece of instrumentation at PTI that is used in making measurements for determining conformance to a standard (or limit), shall be assessed to evaluate its contribution to the overall uncertainty of the measurement in which it is used. The assessment of each item will be based on either a type A evaluation or a type B evaluation. Most of the evaluations will be type B, since they will be based on the manufacturer's statements or specifications of the calibration tolerances, or uncertainty will be stated along with a brief rationale for the type of evaluation and the resulting stated uncertainties.

The individual uncertainties included in the combined standard uncertainty for a specific test result will depend on the configuration in which the item of instrumentation is used. The combination will always be based on the law of propagation of uncertainty. Any systematic effects will be accommodated by including their uncertainties, in the calculation of the combined standard uncertainty; except that if the direction and amount of the systematic effect cannot be determined and separated from its uncertainty, the whole effect will be treated as uncertainty and combined along with the other elements of the test setup.

Type A evaluations of standard uncertainty will usually be based on calculating the standard deviation of the mean of a series of independent observations, but may be based on a least-squares curve fit or the analysis of variance for unusual situations. Type B evaluations of standard uncertainty will usually be based on manufacturer's specifications, data provided in calibration reports, and experience. The type of probability distribution used (normal, rectangular, a priori, or u-shaped) will be stated for each Type B evaluation.

In the evaluation of the uncertainty of each type of measurement, the uncertainty caused by the operator will be estimated. One notable operator contribution to measurement uncertainty is the manipulation of cables to maximize the measured values of radiated emissions. The operator contribution to measurement uncertainty is evaluated by having several operators independently repeat the same test. This results in a Type A evaluation of operator-contributed measurement uncertainty.

A summary of the expanded uncertainties of PTI measurements is shown as Table 1. These are the worst-case uncertainties considering all operative influence factors.

Table 1: Summary of Measurement Uncertainties for Site 45

| Type of Measurement | Frequency Range | Meas. Dist. | Expanded Uncertainty U, dB (k=2) |
|-----------------------------|-------------------|----------------|--|
| Mains Conducted Emissions | 150 kHz to 30 MHz | N/A | 2.9 |
| Telecom Conducted Emissions | 150 kHz to 30 MHz | N/A | 2.8 |
| Radiated Emissions | 30 to 1,000 MHz | 10 m | 4.8 |
| Radiated Emissions | 1 to 18 GHz | 3 m | 5.7 |

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End of Report

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