



FCC PART 15 SUBPART C TEST AND MEASUREMENT REPORT

For

Streetline, Inc.

393 Vintage Park Drive, Suite 140 Foster City, CA 94404, USA

FCC ID: V21SL-EPS

Report Type:

Original Report

Product Type:

Vehicle Sensor

Test Engineers: Quinn Jiang

Report Number: R1110311-247 EPS

Report Date: 2012-06-14

Victor Zhang

Reviewed By: EMC/RF Lead

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* 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		General Description	5
	1.1	Product Description for Equipment Under Test (EUT)	5
	1.2	Mechanical Description of EUT	5
	1.3	J	
	1.4	Related Submittal(s)/Grant(s)	5
	1.5		
	1.6	Measurement Uncertainty	5
	1.7	· · · · · · · · · · · · · · · · · · ·	
2		System Test Configuration	7
	2.1		7
	2.2	EUT Exercise Software	7
	2.3	1 · F	
	2.4	Special Accessories	7
	2.5	Local Support Equipment	7
	2.6	Power Supply and Line Filters	7
	2.7		7
	2.8	EUT Internal Configuration Details	7
3		Summary of Test Results	8
4		FCC §15.247 (i) - RF Exposure	9
	4.1	Applicable Standard	
	4.2	MPE Prediction	9
	4.3	MPE Results	9
5]	FCC §15.203 – Antenna Requirement	
	5.1	11	
	5.2		
6]	FCC §15.207 - Conducted Emissions	
	6.1	rr	
	6.2		
7]	FCC §2.1051 & §15.247(d) - Spurious Emissions at Antenna Terminals	
	7.1	rr	
	7.2		
	7.3	1 I	
	7.4		
	7.5		
8		FCC §15.205, §15.209 & §15.247(d) – Spurious Radiated Emissions	
	8.1		
	8.2		
	8.3		
	8.4		
	8.5		
	8.6		
	8.7		
	8.8		
_	8.9		
9		FCC§15.247(a) (2) – 6 dB & 99% Emission Bandwidth	
	9.1	Applicable Standard	
	9.2		
	9.3	1 1	
	9.4		
	9.5	Test Results	. 26

10 FC	CC§15.247(b) - Peak Output Power Measurement	29
10.1	Applicable Standard	29
10.2	Measurement Procedure	29
10.3	Test Equipment List and Details	29
10.4	Test Environmental Conditions	29
10.5	Test Results	
11 FC	CC §15.247(d) - 100 kHz Bandwidth of Band Edges	
11.1	Applicable Standard	31
11.2	Measurement Procedure	31
11.3	Test Equipment List and Details	31
11.4	Test Environmental Conditions	31
11.5	Test Results	
12 FC	CC §15.247(e) - Power Spectral Density	
12.1	Applicable Standard	
12.2	Measurement Procedure	
12.3	Test Equipment List and Details	
12.4	Test Environmental Conditions	
12.5	Test Results	
13 Ex	xhibit A - FCC Labeling Requirements	
13.1	FCC ID Label Requirements	
13.2	FCC ID Label Contents	
13.3	FCC ID Label Location	
	xhibit B - Test Setup Photographs	
14.1	Radiated Emission Front View	
14.2	Radiated Emission below 1 GHz Rear View	
14.3	Radiated Emission above 1 GHz Rear View	
	xhibit C - EUT Photographs	
15.1	EUT – Top View	
15.2	EUT – Bottom View	
15.3	EUT – Side View	
15.4	EUT – Battery View	
15.5	EUT – Main Board with Shield Top View	
15.6	EUT – Main Board without shield Top View	
15.7	EUT – Main Board Bottom View	43

DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R1110311-247 EPS	Original Report	2012-05-21
1	R1110311-247 EPS	Updated Data	2012-06-14

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test and measurement report was prepared on behalf of *Streetline*, *Inc.*, and their product *Vehicle Sensor* FCC ID: V21SL-EPS, model: *SL-EPS* or the "EUT" as referred to in this report. The EUT is a sensor that operates in the 2.4 GHz band.

1.2 Mechanical Description of EUT

The EUT measures 12cm (Radius) x 5cm (Height), and weighs approximately 360 g.

The test data gathered are from typical production sample, serial number: R1110311-2, assigned by BACL.

1.3 Objective

This report is prepared on behalf of *Streetline, Inc.* in accordance with Part 2, Subpart J, and Part 15, Subparts B and C of the Federal Communication Commissions rules.

The objective is to determine compliance with FCC rules for Output Power, Antenna Requirements, 6 dB Bandwidth, and power spectral density, 100 kHz Bandwidth of Band Edges Measurement, Spurious Emissions, Conducted and Radiated Spurious Emissions.

The circuitry of Vehicle Sensor (FCC ID: V21SL-EPS, model: SL-EPS) is identical to the circuitry of the Repeater (FCC ID: V21SL-RPP, model: SL-RPP); therefore, the conducted measurements of the vehicle sensor was performed on the Repeater (FCC ID: V21SL-RPP, model: SL-RPP).

1.4 Related Submittal(s)/Grant(s)

No Related Submittals.

1.5 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.4-2003, 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.

1.6 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in 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.

Based on NIS 81, The Treatment of Uncertainty in EMC Measurements, the values range from +2.0 for Conducted Emissions tests and +4.0 dB for Radiated Emissions tests are the most accurate estimates pertaining to uncertainty of EMC measurements at BACL.

Detailed instrumentation measurement uncertainties can be found in BACL report QAP-018.

All radiated and conducted emissions measurement was performed at Bay Area Compliance Laboratory, Corp. The radiated testing was performed at an antenna-to-EUT distance of 3 meters.

1.7 Test Facility

The test site used by BACL Corp. to collect radiated and conducted emissions measurement data is located at its facility in Sunnyvale, California, USA.

The test site at BACL Corp. has been fully described in reports submitted to the Federal Communication Commission (FCC) and Voluntary Control Council for Interference (VCCI). The details of these reports have been found to be in compliance with the requirements of Section 2.948 of the FCC Rules on February 11 and December 10, 1997, and Article 8 of the VCCI regulations on December 25, 1997. The test site also complies with the test methods and procedures set forth in CISPR 22:2008 §10.4 for measurements below 1 GHz and §10.6 for measurements above 1 GHz as well as ANSI C63.4-2003, ANSI C63.4-2009, TIA/EIA-603 & CISPR 24:2010.

The Federal Communications Commission and Voluntary Control Council for Interference have the reports on file and they are listed under FCC registration number: 90464 and VCCI Registration No.: A-0027. The test site has been approved by the FCC and VCCI for public use and is listed in the FCC Public Access Link (PAL) database.

Additionally, BACL Corp. is an American Association for laboratory Accreditation (A2LA) accredited laboratory (Lab Code 3297-02). The current scope of accreditations can be found at http://www.a2la.org/scopepdf/3297-02.pdf?CFID=1132286&CFTOKEN=e42a3240dac3f6ba-6DE17DCB-1851-9E57-477422F667031258&jsessionid=8430d44f1f47cf2996124343c704b367816b

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI C63.4-2003.

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

2.2 EUT Exercise Software

N/A

2.3 Equipment Modifications

No modifications were made to the EUT.

2.4 Special Accessories

N/A

2.5 Local Support Equipment

N/A

2.6 Power Supply and Line Filters

N/A

2.7 Interface Ports and Cabling

Cable Description	Length (m)	From	То
RF	<1	EUT	PSA

2.8 EUT Internal Configuration Details

Manufacturers	Descriptions	Models	Serial Numbers
Streetline, Inc.	Main board	SL-EPS	-

3 Summary of Test Results

Results reported relate only to the product tested.

FCC Rules	Description of Test	Results
§15.247 (i)	RF Exposure	Compliant
§15.203	Antenna Requirement	Compliant
§ 15.207 (a)	Conducted Emissions	N/A
§15.209	Spurious Emissions at Antenna Port	Compliant
§15.205, §15.209 (a)	Restricted Bands	Compliant
§15.209 (a), §15.247(d)	Radiated Spurious Emissions	Compliant
§15.247 (a)(2)	6 dB & 99% Emission Bandwidth	Compliant
§15.247 (b)(3)	Maximum Peak Output Power	Compliant
§ 15.247 (d)	100 kHz Bandwidth of Frequency Band Edge	Compliant
§15.247 (e)	Power Spectral Density	Compliant

N/A: EUT is battery powered.

FCC §15.247 (i) - RF Exposure

4.1 **Applicable Standard**

According to FCC §15.247(i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Averaging Time (minutes)
	Limits for Genera	l Population/Uncontr	olled Exposure	
0.3-1.34	614	1.63	*(100)	30
1.34-30	824/f	2.19/f	$*(180/f^2)$	30
30-300	27.5	0.073	0.2	30
300-1500	/	/	f/1500	30
1500-100,000	/	/	1.0	30

f = frequency in MHz

4.2 **MPE Prediction**

Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

$$S = PG/4\pi R^2$$

Where: S = power density

P = power input to antenna

G = power gain of the antenna in the direction of interest relative to an isotropic radiator

R = distance to the center of radiation of the antenna

4.3 **MPE Results**

Maximum peak output power at antenna input terminal (dBm): 20.66 116.4126 Maximum peak output power at antenna input terminal (mW): Prediction distance (cm): 20 Prediction frequency (MHz): 2475 Maximum Antenna Gain, typical (dBi): Maximum Antenna Gain (numeric): 1.0 Power density of prediction frequency at 20.0 cm (mW/cm²): 0.02316

MPE limit for uncontrolled exposure at prediction frequency (mW/cm²): 1.0

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.02316 mW/cm². Limit is 1 mW/cm².

^{* =} Plane-wave equivalent power density

5 FCC §15.203 – Antenna Requirement

5.1 Applicable Standard

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.

5.2 Antenna Connector Construction

EUT has one Transmitter/Receiver internal antenna. The transmitter antenna has a max gain of 0 dBi; which fulfills the requirements of FCC §15.203.

Frequency Band	Antenna Gain (dBi)
2.4 GHz	0

6 FCC §15.207 - Conducted Emissions

6.1 Applicable Standard

As per FCC $\S15.207$ Conducted limits: For an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the band 150 kHz to 30 MHz shall not exceed the limits in the following table, as measured using a $50 \mu \text{H}/50$ ohms line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the boundary between the frequencies ranges.

Frequency of Emission	Conducted Limit (dBuV)		
(MHz)	Quasi-peak	Average	
0.15-0.5	66 to 56 ¹	56 to 46 ¹	
0.5-5	56	46	
5-30	60	50	

*Note*¹: *Decreases with the logarithm of the frequency.*

6.2 Summary of Test Results

N/A: EUT is battery powered.

7 FCC §2.1051 & §15.247(d) - Spurious Emissions at Antenna Terminals

7.1 Applicable Standard

For FCC §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.

Requirements: FCC §2.1051.

The spectrum was to be investigated to the tenth harmonics of the highest fundamental frequency as specified in §2.1057.

7.2 Measurement Procedure

The RF output of the EUT was connected to a spectrum analyzer through appropriate attenuation. The resolution bandwidth of the spectrum analyzer was set at 100 kHz. Sufficient scans were taken to show any out of band emissions up to 10th harmonic.

7.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date
Agilent	Spectrum Analyzer	E4440A	MY44303352	2011-05-10

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

7.4 Test Environmental Conditions

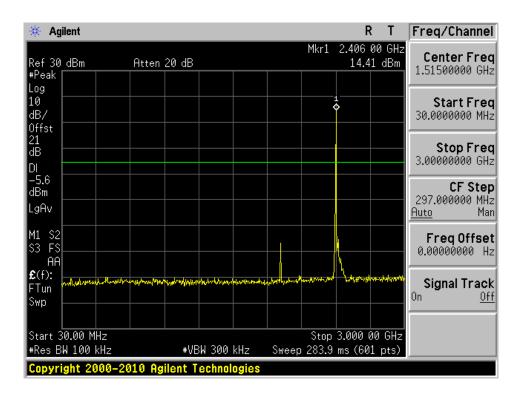
Temperature:	18~22 °C
Relative Humidity:	35~42 %
ATM Pressure:	101-102kPa

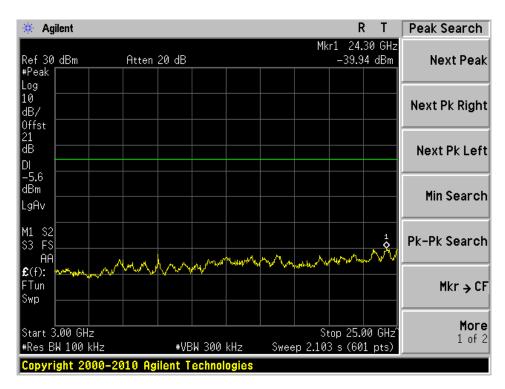
The testing was performed by Quinn Jiang from 2011-11-12 and 2011-11-16 in the RF Site.

7.5 Test Results

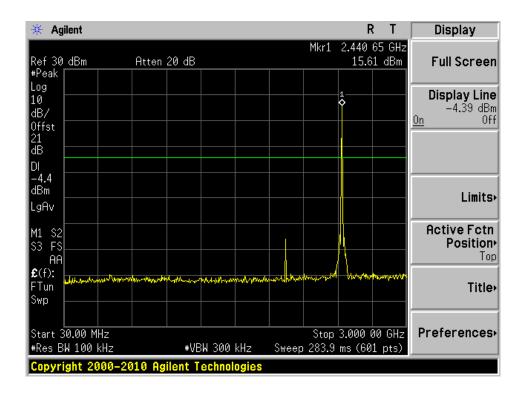
Please refer to following plots of spurious emissions.

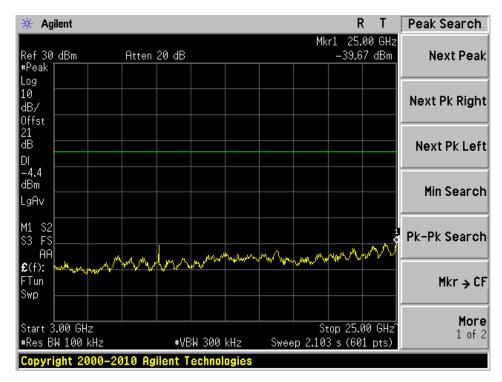
Low Channel 2405 MHz



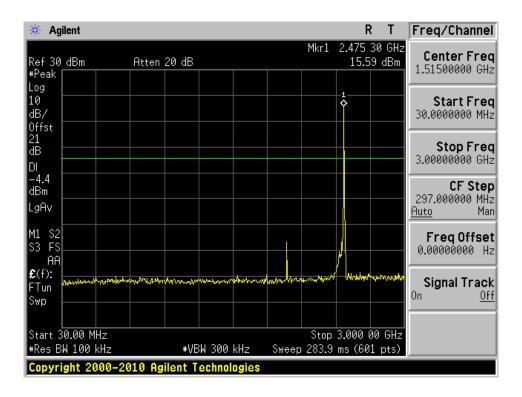


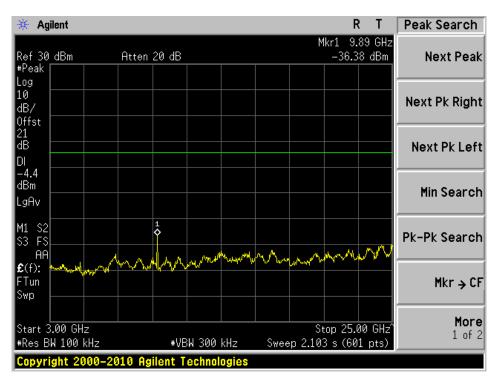
Middle Channel 2440 MHz





High Channel 2475 MHz





8 FCC §15.205, §15.209 & §15.247(d) – Spurious Radiated Emissions

8.1 Applicable Standard

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 §15.209(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 §15.205(a) 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
$\begin{array}{c} 0.090 - 0.110 \\ 0.495 - 0.505 \\ 2.1735 - 2.1905 \\ 4.125 - 4.128 \\ 4.17725 - 4.17775 \\ 4.20725 - 4.20775 \\ 6.215 - 6.218 \\ 6.26775 - 6.26825 \\ 6.31175 - 6.31225 \\ 8.291 - 8.294 \\ 8.362 - 8.366 \\ 8.37625 - 8.38675 \\ 8.41425 - 8.41475 \\ 12.29 - 12.293 \\ 12.51975 - 12.52025 \\ 12.57675 - 12.57725 \\ 13.36 - 13.41 \end{array}$	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 §15.247 (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 §15.205(c).

8.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.4-2003. The specification used was the FCC 15 Subpart C limits.

8.3 EUT Setup

The radiated emissions tests were performed using the setup accordance with the ANSI C63.4-2003. The specification used was the FCC 15C 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.

8.4 Test Procedure

For the radiated emissions test, the EUT host, and all support equipment power cords was 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 is set 3 meter away from the testing antenna, which is varied from 1-4 meter, and the EUT is placed on a turntable, which is 0.8 meter above ground plane, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna should be changed the polarization both of horizontal and vertical.

The spectrum analyzer or receiver is set as:

Below 1000MHz:

$$RBW = 100 \text{ kHz} / VBW = 300 \text{ kHz} / Sweep = Auto$$

Above 1000MHz:

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

8.5 Corrected Amplitude & Margin Calculation

The Corrected Amplitude is calculated by adding the Cable Loss, and Attenuator Factor adding to the Indicated Reading. The basic equation is as follows:

Corrected Amplitude = Indicated Reading + Cable Loss + Attenuator Factor

For example, a Corrected Amplitude of 34.08 dBuV/m = Indicated Reading (23.85 dBuV) + Cable Factor (0.22 dB) + Attenuator Factor (10dB)

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

8.6 Test Equipment List and Details

Manufacturer	Description Model		Serial Number	Calibration Date
Agilent	Spectrum Analyzer	E4440A	MY44303352	2011-05-10
Sunol Science Corp	System Controller	SC99V	122303-1	N/R
Sunol Science Corp	Combination Antenna	JB3	A020106-3	2011-06-29
A.R.A Inc	Horn antenna	DRG-1181A	1132	2010-11-29
Hewlett Packard	Pre amplifier	8447D	2944A06639	2011-06-09
Mini-Circuits	Pre Amplifier	ZVA-183-S	570400946	2011-05-09

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

8.7 Test Environmental Conditions

Temperature:	18~22 °C
Relative Humidity:	35~42 %
ATM Pressure:	101-102kPa

The testing was performed by Quinn Jiang from 2012-10-31 and 2011-11-16 in Chamber 3.

8.8 Summary of Test Results

According to the data hereinafter, the EUT <u>complied with the FCC Title 47, Part 15, Subpart C, section 15.205, 15.209 and 15.247</u> standard's radiated emissions limits, and had the worst margin of:

30-1000 MHz:

Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Frequency Range (MHz)
-	-	-	Note ¹

Note1: all emissions were on the noise floor/20 dB below the limit

Above 1 GHz:

Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Frequency Range (MHz)
-4.16	4949	Vertical	1000-25000

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

8.9 Radiated Emissions Test Result Data

Radiated Emission at 3 meters, 30 MHz - 1 GHz

Frequency (MHz)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Correction Factor (dB)	Ant. Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Comments
-	-	-	-	-	-	-	Note ¹	QP

Note1: all emissions were on the noise floor/20 dB below the limit

Radiated Emission at 3 meters, 1 – 25 GHz

E	S.A.	Turntable	To	est Antenna	a	Cable	Pre-	Cord.	Part	15C	
Frequency (MHz)	Reading (dBµV)	Azimuth (degrees)	Height (cm)	Polarity (H/V)	Factor (dB/m)	Loss (dB)	Amp. (dB)	Amp. (dBµV/m)	Limit (dBµV/m)	Margin (dB)	Comment
	Low Channel 2405 MHz, measured at 3 meters										
4810	57.58	225	106	V	32.9	5.56	27.5	68.540	74	-5.460	peak
4810	53.87	167	100	Н	32.9	5.56	27.5	64.830	74	-9.170	peak
4810	1	-	-	V	1	-	-	44.24	54	-9.76	Ave ¹
4810	1	-	-	Н	1	-	-	40.53	54	-13.47	Ave ¹
	Middle Channel 2440 MHz, measured at 3 meters										
4880	57.59	258	118	V	32.9	5.56	27.5	68.550	74	-5.45	peak
4880	56.4	182	110	Н	32.9	5.56	27.5	67.360	74	-6.64	peak
4880	-	-	-	V				44.25	54	-9.75	Ave ¹
4880	1	-	-	Н				43.06	54	-10.94	Ave ¹
	High Channel 2475 MHz, measured at 3 meters										
4949	58.88	170	105	V	32.9	5.56	27.5	69.840	74	-4.16	Peak
4949	54.83	328	100	Н	32.9	5.56	27.5	65.790	74	-8.21	Peak
4949	-	-	-	V	-	-	-	45.54	54	-8.46	Ave ¹
4949	-	-	-	Н	-	-	-	41.49	54	-12.51	Ave ¹

*Note*¹: based on the document, FCC_Duty_Cycle_Reference_Non_Routing_Child_signed provided by the manufacture, Average reading can be calculated using 24.3 dB reductions. Please refer to the document below for detail information.



December 6, 2011

Federal Communications Commission 7435 Oakland Mills Road Columbia, MD 21046

Ref: DN2510 Maximum Duty Cycle over a 100 ms window

Dear Examiner,

Dust radios operate on a TDMA time schedule consisting of a continuous sequence of 10 ms timeslots. Transmission duration during a timeslot varies as a function of the payload, with a maximum of 128 bytes. The following types of messages and there frequency for a non-routing radio are:

- Upstream packet, no more than once every 256 timeslots or 2.56 seconds, maximum 128 byte payload
- Acknowledge of a downstream packet, no more than once every 1024 timeslots or 10.24 seconds, fixed payload of 23 bytes
- 3) Keep alive message, no more than once every 30 seconds, fixed payload of 20 bytes

A radio transmit consists of 4 stages:

- 1) Initialization: radio is prepared for transmit (transmitter is off)
- 2) Ramp up: transmitter is ramped to peak power
- 3) Transmit: from 0 to 128 bytes of data maximum + 5 bytes preamble/SFD
- 4) Ramp down: radio transmitter is turned off,

Where the data rate is 250 kbps +/- 40 ppm, or 32 us/byte.

Ramp up and ramp down of the takes 54 us. Given the frequency of the messages the maximum duty time the radio can be transmitting over a 100 ms is:

```
Max Tx on = 1*Upstream_packet[128 bytes] + 1*Acknowledge + 1*Keep Alive

= 1*[(128+5)*32us + 54us] + 1*[(23+5)*32us + 54us] +

= 1*[(20+5)*32us + 54us]

= 4.310 ms + 0.950 ms + 0.854 ms

= 6.114 ms
```

Maximum duty cycle is therefore:

6.114 ms on / 100 ms = 6.114 %

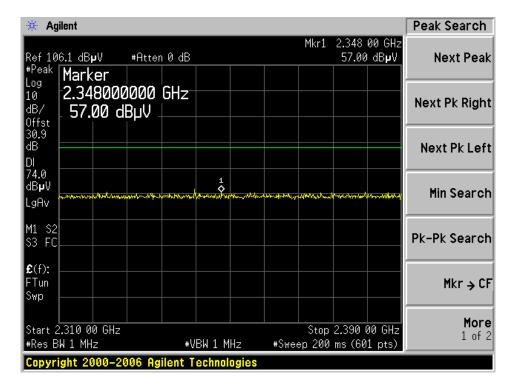
For reference a zero span capture of a 128 byte packet is shown in Figure 1:.



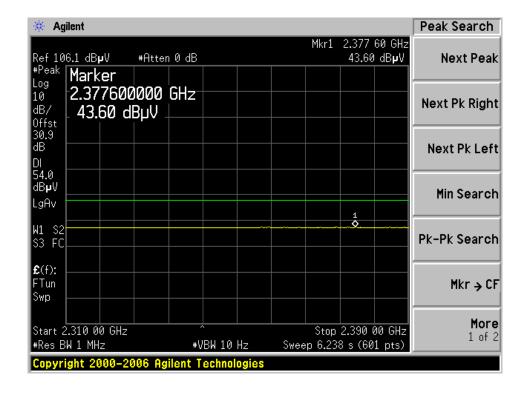
Report Number: R1110311-247 EPS

Restricted Band Emissions

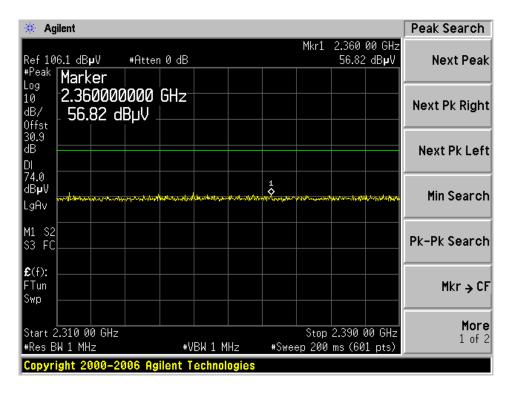
Lowest Channel at Horizontal, Peak



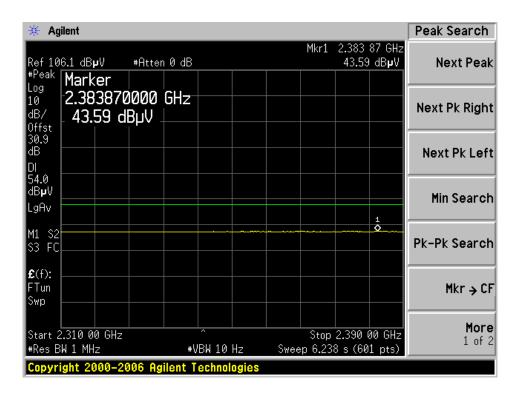
Lowest Channel at Horizontal, Average



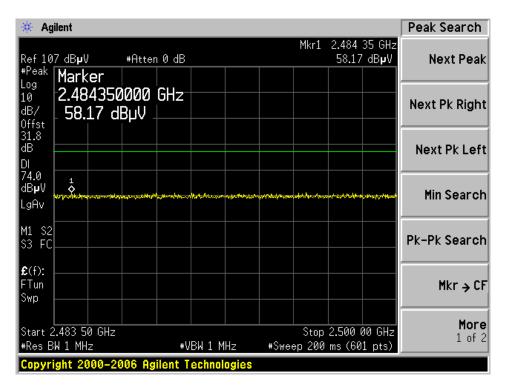
Lowest Channel at Vertical, Peak



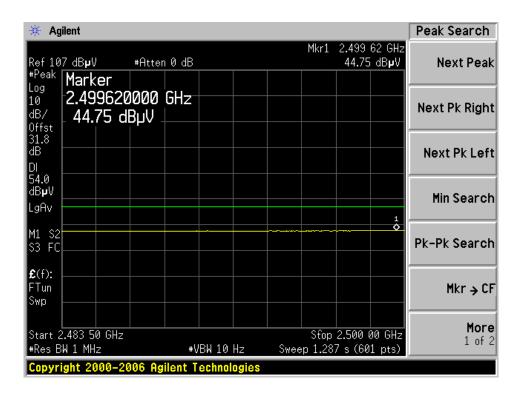
Lowest Channel at Vertical, Average



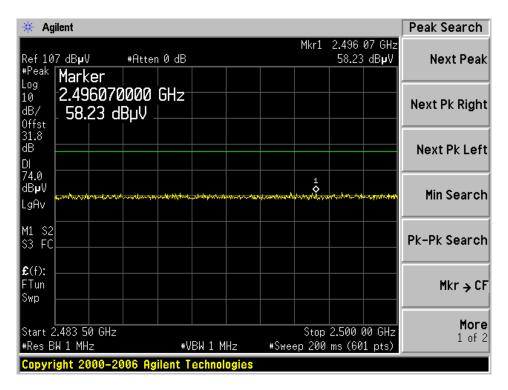
Highest Channel at Horizontal, Peak



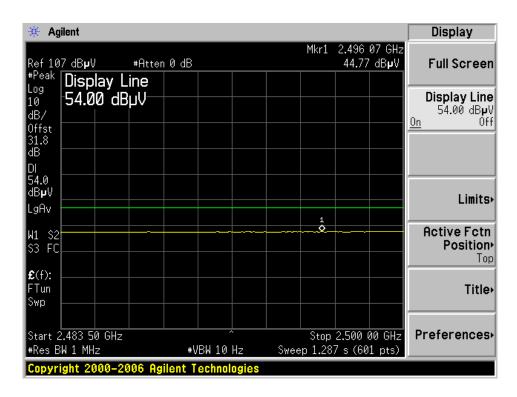
Highest Channel at Horizontal, Average



Highest Channel at Vertical, Peak



Highest Channel at Vertical, Average



9 FCC§15.247(a) (2) – 6 dB & 99% Emission Bandwidth

9.1 Applicable Standard

According to FCC §15.247(a)(2), systems using digital modulation techniques may operate in the 902 - 928 MHz, 2400 - 2483.5 MHz, and 5725 - 5850 MHz bands. The minimum 6 dB bandwidth shall be at least 500 kHz

9.2 Measurement Procedure

- 1) Check the calibration of the measuring instrument using either an internal calibrator or a known signal from an external generator.
- 2) Position the EUT without connection to measurement instrument. Turn on the EUT and connect it to measurement instrument. Then set it to any one convenient frequency within its operating range. Set a reference level on the measuring instrument equal to the highest peak value.
- 3) Measure the frequency difference of two frequencies that were attenuated 6 dB from the reference level.
- 4) Record the frequency difference as the emissions bandwidth.
- 5) Repeat above procedures until all frequencies measured were complete.

9.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date
Agilent	Spectrum Analyzer	E4440A	MY44303352	2011-05-10

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

9.4 Test Environmental Conditions

Temperature:	18~22 °C
Relative Humidity:	35~42 %
ATM Pressure:	101-102kPa

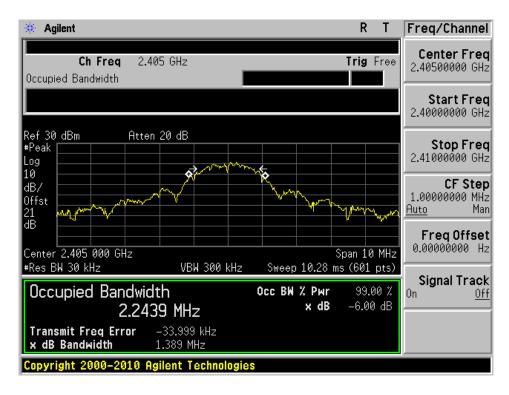
The testing was performed by Quinn Jiang from 2011-11-12 and 2011-11-16 in the RF Site.

9.5 Test Results

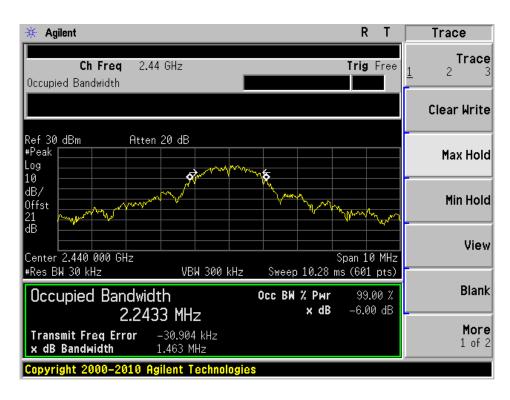
Channel	Frequency (MHz)	6 dB Emission Bandwidth (MHz)	99% Emission Bandwidth (MHz)	Limit (MHz)	Results
Low	2405	1.389	2.2439	> 0.5	Compliant
Middle	2440	1.463	2.2433	> 0.5	Compliant
High	2475	1.365	2.2325	> 0.5	Compliant

Please refer to the following plots for detailed test results:

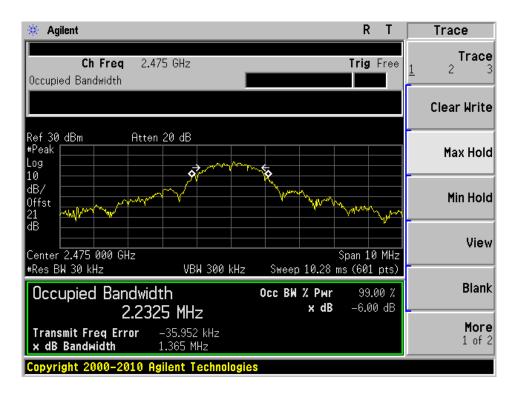
Low Channel 2405 MHz



Middle Channel 2440 MHz



High Channel 2475 MHz



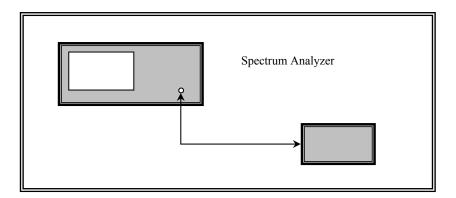
10 FCC§15.247(b) - Peak Output Power Measurement

10.1 Applicable Standard

According to FCC \$15.247(b) (3) for systems using digital modulation in the 902–928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz bands: 1 Watt.

10.2 Measurement Procedure

- 1. Place the EUT on a bench and set it in transmitting mode.
- 2. Remove the antenna from the EUT and then connect a low loss RF cable from the antenna port to a spectrum analyzer.
- 3. Add a correction factor to the display.



10.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	
Agilent	Spectrum Analyzer	E4440A	MY44303352	2011-05-10	

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

10.4 Test Environmental Conditions

Temperature:	18~22 °C
Relative Humidity:	35~42 %
ATM Pressure:	101-102kPa

The testing was performed by Quinn Jiang from 2011-11-12 and 2011-11-16 in the RF Site

10.5 Test Results

Channel	Frequency (MHz)	Conducted Output Power (dBm)	Limit (dBm)	Margin (dB)
Low	2405	18.70	30	-11.30
Mid	2440	20.24	30	-9.76
High	2475	20.66	30	-9.34

11 FCC §15.247(d) - 100 kHz Bandwidth of Band Edges

11.1 Applicable Standard

According to FCC §15.247(d), in any 100 kHz bandwidth outside the frequency bands in which the spread spectrum 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. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emissions limits specified in §15.209(a) see §15.205(c).

11.2 Measurement Procedure

- 1. Check the calibration of the measuring instrument using either an internal calibrator or a known signal from an external generator.
- 2. Position the EUT without connection to measurement instrument. Turn on the EUT and connect its antenna terminal to measurement instrument via a low loss cable. Then set it to any one measured frequency within its operating range, and make sure the instrument is operated in its linear range.
- 3. Set both RBW and VBW of spectrum analyzer to 100 kHz with a convenient frequency span including 100 kHz bandwidth from band edge.
- 4. Measure the highest amplitude appearing on spectral display and set it as a reference level. Plot the graph with marking the highest point and edge frequency.
- 5. Repeat above procedures until all measured frequencies were complete.

11.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date
Agilent	Spectrum Analyzer	E4440A	MY44303352	2011-05-10

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

11.4 Test Environmental Conditions

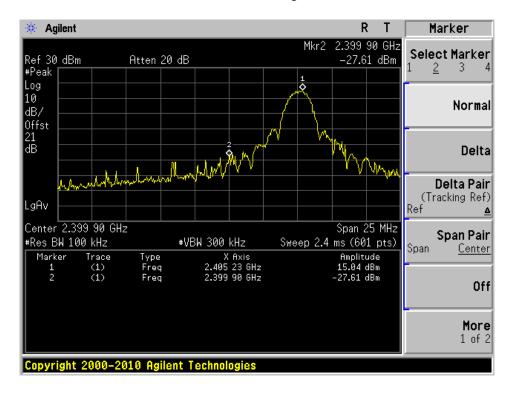
Temperature:	18~22 °C		
Relative Humidity:	35~42 %		
ATM Pressure:	101-102kPa		

The testing was performed by Quinn Jiang from 2011-11-12 and 2011-11-16 in the RF Site.

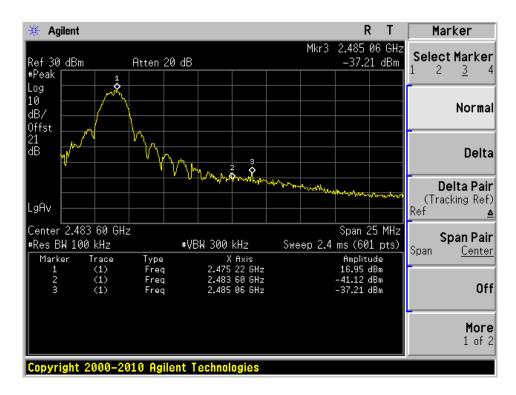
11.5 Test Results

Please refer to following pages for plots of band edge.

Low Band Edge



High Band Edge



12 FCC §15.247(e) - Power Spectral Density

12.1 Applicable Standard

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

12.2 Measurement Procedure

- 1. Use this procedure when the maximum peak conducted output power in the fundamental emission is used to demonstrate compliance.
- 2. Set the RBW = 100 kHz.
- 3. Set the VBW \geq 300 kHz.
- 4. Set the span to 5-30 % greater than the EBW.
- 5. Detector = peak.
- 6. Sweep time = auto couple.
- 7. Trace mode = max hold.
- 8. Allow trace to fully stabilize.
- 9. Use the peak marker function to determine the maximum power level in any 100 kHz band segment within the fundamental EBW.
- 10. Scale the observed power level to an equivalent value in 3 kHz by adjusting (reducing) the measured power by a bandwidth correction factor (BWCF) where BWCF = $10\log (3 \text{ kHz}/100 \text{ kHz} = -15.2 \text{ dB})$.
- 11. The resulting peak PSD level must be ≤ 8 dBm.

12.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date
Agilent	Spectrum Analyzer	E4440A	MY44303352	2012-04-10

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

12.4 Test Environmental Conditions

Temperature:	22 °C	
Relative Humidity:	42 %	
ATM Pressure:	102.2kPa	

The testing was performed by Quinn Jiang from 2012-06-14 in the RF Site.

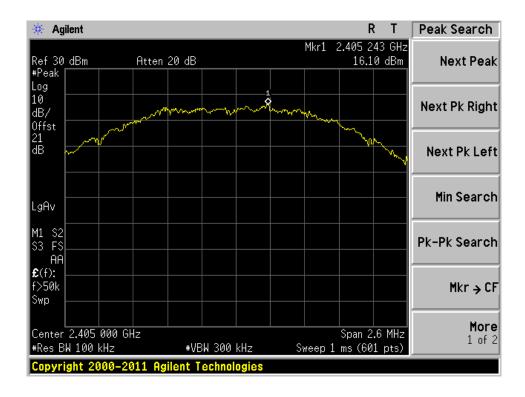
12.5 Test Results

Channel	Frequency (MHz)	PSD (dBm/100 kHz)	Corrected PSD (dBm)	Limit (dBm/3kHz)	Results
Low	2405	16.10	0.90	8	Compliant
Mid	2440	17.00	1.80	8	Compliant
High	2475	17.12	1.92	8	Compliant

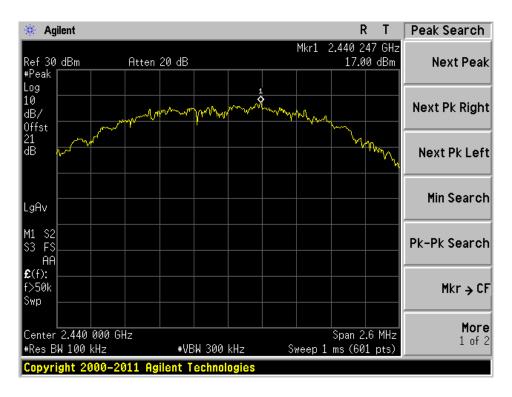
Note: All the data can be scaled to an equivalent value in 3 kHz by adjusting (reducing) the measured power by a bandwidth correction factor (BWCF) where BWCF=10log (3 kHz/100 kHz=-15.2 dB).

Please refer to the following plots for detailed test results:

Low Channel 2405 MHz



Middle Channel 2440 MHz



High Channel 2475 MHz

