



MET Laboratories, Inc. *Safety Certification - EMI - Telecom Environmental Simulation*

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June 6, 2012

System Planning Corporation
3601 Wilson Blvd.
Arlington, VA 22201

Dear Lewis Bromberg,

Enclosed is the EMC Wireless test report for compliance testing of the System Planning Corporation, E-Seal W/Zigbee Interface V2 as tested to the requirements of Title 47 of the CFR, Ch. 1 (10-1-06 ed.), Part 15, Subpart B, ICES-003, Issue 4 February 2004 for a Class B Digital Device and FCC Part 15 Subpart C, RSS-210, Issue 8, Dec. 2010 for Intentional Radiators.

Thank you for using the services of MET Laboratories, Inc. If you have any questions regarding these results or if MET can be of further service to you, please feel free to contact me.

Sincerely yours,
MET LABORATORIES, INC.

Jennifer Warnell
Documentation Department

Reference: (\\System Planning Corporation\\EMC30289-FCC247 Rev. 1)

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Electromagnetic Compatibility Criteria Test Report

for the

**System Planning Corporation
E-Seal W/Zigbee Interface V2**

Tested under
the FCC Certification Rules
contained in
Title 47 of the CFR, Parts 15 Subpart B & ICES-003
for Class B Digital Devices
&
15.247 Subpart C & RSS-210, Issue 8, Dec. 2010
for Intentional Radiators

MET Report: EMC30289-FCC247 Rev. 1

June 6, 2012

Prepared For:

**System Planning Corporation
3601 Wilson Blvd.
Arlington, VA 22201**

Prepared By:
MET Laboratories, Inc.
914 W. Patapsco Ave
Baltimore, MD 21230

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15.247 Subpart C & RSS-210, Issue 8, Dec. 2010
for Intentional Radiators



Len Knight, Project Engineer
Electromagnetic Compatibility Lab



Jennifer Warnell
Documentation Department

Engineering Statement: The measurements shown in this report were made in accordance with the procedures indicated, and the emissions from this equipment were found to be within the limits applicable. I assume full responsibility for the accuracy and completeness of these measurements, and for the qualifications of all persons taking them. It is further stated that upon the basis of the measurements made, the equipment tested is capable of operation in accordance with the requirements of the FCC Rules Parts 15B, 15.247 and Industry Canada standards ICES-003, Issue 4 February 2004, RSS-210, Issue 8, Dec. 2010 under normal use and maintenance.



Shawn McMillen,
Wireless Manager, Electromagnetic Compatibility Lab



Draft Status Sheet

Draft Revision	Draft Date	Reason for Revision
Ø	May 29, 2012	Initial Draft Issue.
1	June 6, 2012	Editorial corrections.

Table of Contents

I.	Executive Summary	1
	A. Purpose of Test	2
	B. Executive Summary	2
II.	Equipment Configuration	3
	A. Overview.....	4
	B. References.....	5
	C. Test Site	5
	D. Description of Test Sample.....	6
	E. Equipment Configuration.....	6
	F. Mode of Operation.....	7
	G. Modifications	7
	a) Modifications to EUT	7
	b) Modifications to Test Standard.....	7
	H. Disposition of EUT	7
III.	Electromagnetic Compatibility Criteria for Unintentional Radiators	8
	§ 15.107(a) Conducted Emissions Limits.....	9
	§ 15.109(a) Radiated Emissions Limits.....	10
IV.	Electromagnetic Compatibility Criteria for Intentional Radiators.....	13
	§ 15.203 Antenna Requirement	14
	§ 15.207(a) Conducted Emissions Limits.....	15
	§ 15.247(a)(a) 6 dB and 99% Bandwidth	16
	§ 15.247(b) Peak Power Output	20
	§ 15.247(d) Radiated Spurious Emissions Requirements and Band Edge.....	23
	§ 15.247(d) RF Conducted Spurious Emissions Requirements and Band Edge.....	31
	§ 15.247(e) Peak Power Spectral Density	33
	§ 15.247(i) Maximum Permissible Exposure	36
	RSS-GEN Receiver Spurious Emissions	37
V.	Test Equipment	39
VI.	Certification & User's Manual Information	41
	A. Certification Information	42
	B. Label and User's Manual Information	46
VII.	ICES-003 Procedural & Labeling Requirements.....	48

List of Tables

Table 1. Executive Summary of EMC Part 15.247 Compliance Testing	2
Table 2. EUT Summary Table.....	4
Table 3. References	5
Table 4. Equipment Configuration	6
Table 5. Conducted Limits for Radio Frequency Devices calculated from FCC Part 15 Subsections 15.107(a) (b) and 15.207(a)	9
Table 6. Radiated Emissions Limits calculated from FCC Part 15, § 15.109 (a) (b)	10
Table 7. Conducted Limits for Intentional Radiators from FCC Part 15 § 15.207(a)	15
Table 8. Occupied Bandwidth, Test Results.....	17
Table 9. Output Power Requirements from §15.247(b)	20
Table 10. Peak Power Output, Test Results	21
Table 11. Restricted Bands of Operation.....	23
Table 12. Radiated Emissions Limits Calculated from FCC Part 15, § 15.209 (a)	24
Table 13. Radiated Harmonic Emissions, Low Channel.....	25
Table 14. Radiated Harmonic Emissions, Mid Channel.....	25
Table 15. Radiated Harmonic Emissions, High Channel	25
Table 16. Peak Power Spectral Density, Test Results	34
Table 17. Spurious Emission Limits for Receivers	37
Table 18. Test Equipment List	40

List of Plots

Plot 1. Radiated Emissions, Pre-Scan, FCC Limits.....	11
Plot 2. Radiated Emissions, Pre-Scan, ICES-003 Limits	11
Plot 3. 6 dB Bandwidth, Low Channel	18
Plot 4. 6 dB Bandwidth, Mid Channel	18
Plot 5. 6 dB Bandwidth, High Channel	18
Plot 6. 99% Occupied Bandwidth, Low Channel	19
Plot 7. 99% Occupied Bandwidth, Mid Channel.....	19
Plot 8. 99% Occupied Bandwidth, High Channel	19
Plot 9. Peak Power Output, Low Channel	22
Plot 10. Peak Power Output, Mid Channel.....	22
Plot 11. Peak Power Output, High Channel	22
Plot 12. Radiated Spurious Emissions, Low Channel, 30 MHz – 1 GHz.....	26
Plot 13. Radiated Spurious Emissions, Low Channel, 3 GHz – 26.5 GHz.....	26
Plot 14. Radiated Spurious Emissions, Mid Channel, 30 MHz – 1 GHz	26
Plot 15. Radiated Spurious Emissions, Mid Channel, 3 GHz – 26.5 GHz	27
Plot 16. Radiated Spurious Emissions, High Channel, 30 MHz – 1 GHz	27
Plot 17. Radiated Spurious Emissions, High Channel, 3 GHz – 26.5 GHz.....	27
Plot 18. Radiated Restricted Band Edge, Low Channel, Average.....	28
Plot 19. Radiated Restricted Band Edge, Low Channel, Peak	28
Plot 20. Radiated Restricted Band Edge, High Channel, Average	29
Plot 21. Radiated Restricted Band Edge, High Channel, Peak.....	29
Plot 22. Conducted Spurious Emissions, Low Channel	32
Plot 23. Conducted Spurious Emissions, Mid Channel.....	32
Plot 24. Conducted Spurious Emissions, High Channel.....	32
Plot 25. Peak Power Spectral Density, Low Channel.....	35
Plot 26. Peak Power Spectral Density, Mid Channel	35
Plot 27. Peak Power Spectral Density, High Channel	35
Plot 28. Receiver Spurious Emissions	38

List of Figures

Figure 1. Block Diagram, Conducted Spurious Emissions Test Setup..... **Error! Bookmark not defined.**

List of Photographs

Photograph 1. Radiated Emission, Test Setup.....12
Photograph 2. Radiated Spurious Emissions, Test Setup30

List of Terms and Abbreviations

AC	Alternating Current
ACF	Antenna Correction Factor
Cal	Calibration
<i>d</i>	Measurement Distance
dB	Decibels
dBμA	Decibels above one microamp
dBμV	Decibels above one microvolt
dBμA/m	Decibels above one microamp per meter
dBμV/m	Decibels above one microvolt per meter
DC	Direct Current
E	Electric Field
DSL	Digital Subscriber Line
ESD	Electrostatic Discharge
EUT	Equipment Under Test
<i>f</i>	Frequency
FCC	Federal Communications Commission
GRP	Ground Reference Plane
H	Magnetic Field
HCP	Horizontal Coupling Plane
Hz	Hertz
IEC	International Electrotechnical Commission
kHz	kilohertz
kPa	kilopascal
kV	kilovolt
LISN	Line Impedance Stabilization Network
MHz	Megahertz
μH	microhenry
μ	microfarad
μs	microseconds
NEBS	Network Equipment-Building System
PRF	Pulse Repetition Frequency
RF	Radio Frequency
RMS	Root-Mean-Square
TWT	Traveling Wave Tube
V/m	Volts per meter
VCP	Vertical Coupling Plane

I. Executive Summary

A. Purpose of Test

An EMC evaluation was performed to determine compliance of the System Planning Corporation E-Seal W/Zigbee Interface V2, with the requirements of Part 15, §15.247. All references are to the most current version of Title 47 of the Code of Federal Regulations in effect. In accordance with §2.1033, the following data is presented in support of the Certification of the E-Seal W/Zigbee Interface V2. System Planning Corporation should retain a copy of this document which should be kept on file for at least two years after the manufacturing of the E-Seal W/Zigbee Interface V2, has been **permanently** discontinued.

B. Executive Summary

The following tests were conducted on a sample of the equipment for the purpose of demonstrating compliance with Part 15, §15.247, in accordance with System Planning Corporation, purchase order number 58871. All tests were conducted using measurement procedure ANSI C63.4-2003.

FCC Reference 47 CFR Part 15.247:2005	IC Reference RSS-210 Issue 8: 2010; RSS-GEN Issue 3: 2010	Description	Compliance
47 CFR Part 15.107 (a)	ICES-003 Issue 4 February 2004	Conducted Emission Limits for a Class B Digital Device	Not Applicable
47 CFR Part 15.109 (a)	ICES-003 Issue 4 February 2004	Radiated Emission Limits for a Class B Digital Device	Compliant
Title 47 of the CFR, Part 15 §15.203	N/A	Antenna Requirement	Compliant
Title 47 of the CFR, Part 15 §15.207(a)	RSS-210(7.2.4)	Conducted Emission Limits	Not Applicable
Title 47 of the CFR, Part 15 §15.247(a)(2)	RSS-GEN(4.6)	6dB Occupied Bandwidth	Compliant
		99% Occupied Bandwidth	Compliant
Title 47 of the CFR, Part 15 §15.247(b)	RSS-210(A8.4)	Peak Power Output	Compliant
Title 47 of the CFR, Part 15 §15.247(d); §15.209; §15.205	RSS-210(A8.5)	Radiated Spurious Emissions Requirements	Compliant
Title 47 of the CFR, Part 15 §15.247(d)	RSS-210(A8.5)	RF Conducted Spurious Emissions Requirements	Compliant
Title 47 of the CFR, Part 15 §15.247(d)	RSS-210(A8.5)	RF Conducted Band Edge	Compliant
Title 47 of the CFR, Part 15; §15.247(e)	RSS-210(A8.2)	Peak Power Spectral Density	Compliant
Title 47 of the CFR, Part 15 §15.247(i)	RSS-GEN(5.6)	Maximum Permissible Exposure (MPE)	Compliant
N/A	RSS-GEN(4.10)	Receiver Spurious Emissions	Compliant

Table 1. Executive Summary of EMC Part 15.247 Compliance Testing

II. Equipment Configuration

A. Overview

MET Laboratories, Inc. was contracted by System Planning Corporation to perform testing on the E-Seal W/Zigbee Interface V2, under System Planning Corporation's purchase order number 58871.

This document describes the test setups, test methods, required test equipment, and the test limit criteria used to perform compliance testing of the System Planning Corporation, E-Seal W/Zigbee Interface V2.

The results obtained relate only to the item(s) tested.

Model(s) Tested:	E-Seal W/Zigbee Interface V2	
Model(s) Covered:	E-Seal W/Zigbee Interface V2	
EUT Specifications:	Primary Power: 3.7 VDC Battery	
	FCC ID: XDY-ESEALV2	
	IC: 8391A-ESEALV2	
	Type of Modulations:	OQPSK
	Equipment Code:	DTS
	Peak RF Output Power:	6.937 mW
	EUT Frequency Ranges:	2405 – 2475 MHz
Analysis:	The results obtained relate only to the item(s) tested.	
Environmental Test Conditions:	Temperature: 15-35° C	
	Relative Humidity: 30-60%	
	Barometric Pressure: 860-1060 mbar	
Evaluated by:	Len Knight	
Report Date(s):	June 6, 2012	

Table 2. EUT Summary Table

B. References

CFR 47, Part 15, Subpart C	Federal Communication Commission, Code of Federal Regulations, Title 47, Part 15: General Rules and Regulations, Allocation, Assignment, and Use of Radio Frequencies
RSS-210, Issue 8, Dec. 2010	Low-power Licence-exempt Radiocommunications Devices (All Frequency Bands): Category I Equipment
CFR 47, Part 15, Subpart B	Electromagnetic Compatibility: Criteria for Radio Frequency Devices
ICES-003, Issue 4 February 2004	Electromagnetic Compatibility: Criteria for Radio Frequency Devices
ANSI C63.4:2003	Methods and Measurements of Radio-Noise Emissions from Low-Voltage Electrical And Electronic Equipment in the Range of 9 kHz to 40 GHz
ANSI/NCSL Z540-1-1994	Calibration Laboratories and Measuring and Test Equipment - General Requirements
ANSI/ISO/IEC 17025:2000	General Requirements for the Competence of Testing and Calibration Laboratories
ANSI C63.10-2009	American National Standard for Testing Unlicensed Wireless Devices

Table 3. References

C. Test Site

All testing was performed at MET Laboratories, Inc., 914 W. Patapsco Ave., Baltimore, MD 21230. All equipment used in making physical determinations is accurate and bears recent traceability to the National Institute of Standards and Technology.

Radiated Emissions measurements were performed in a 3 meter semi-anechoic chamber (equivalent to an Open Area Test Site). In accordance with §2.948(a)(3), a complete site description is contained at MET Laboratories.

D. Description of Test Sample

The System Planning Corporation E-Seal W/Zigbee Interface V2, Equipment Under Test (EUT), is designed as a security device. The unit reads a special bolt barrier seal and reports the bolt status and any bolt events via ZigBee. During operation, the EUT acts as follows:

The EUT starts in sleep mode. In sleep mode, the device is complete asleep and only monitors bolt events.

When a bolt event (caused by insertion) is read, the EUT enters search mode. The device searches for a master device (coordinator from here on out) for 8 minutes. If no coordinator is available, the device wakes to search for 8 minutes every hour for the next 6 hours. If no coordinator is found, the device will enter sleep mode.

If a coordinator is found, the device will pair with the coordinator and enter active mode. In active mode, the duty cycle of the device is determined by the coordinator's configuration. The device is typically awake for < 2 seconds every 1 to 4 minutes. If the coordinator is lost, the device will search for the same coordinator for 4 minutes. If it cannot reconnect, it enters search mode as described above.

E. Equipment Configuration

The EUT was a stand-alone device which required no support equipment once it was programmed. Two identical samples were submitted for evaluation.

Ref. ID	Name / Description	Model Number	Serial Number
19658	Assembly, E-Seal w/Zigbee Interface V2, Globaltrak	000D6F0000333C1A	19658
19657	Assembly, E-Seal w/Zigbee Interface, V2, Globaltrak	000D6F0000333C01	19657

Table 4. Equipment Configuration

F. Mode of Operation

The EUT has a test mode where it can be set to transmit at 100% duty cycle on specific channels, or in a receive only mode. The EUT has an external RS232 connection that is connected to a terminal application on a PC, such as HyperTerminal. To control the device, the following commands are used:

LEDTEST –
LEDON x –
LEDOFF x –
TXSTREAM – Constant stream of packets with no breaks (key exits)
TXTONE – TX Tone, Single Carrier Output
TXPOWERMODE Ip – Set Tx power level I (0=normal, 1=boost) and PA p (0=int, 1=ext).
CALCHANNEL c – Switch to and recalibrate channel c (default is current channel).
PERSCALER – Run a PreScaler test.
PRINTCRASH – Print out crash info.
TOKREAD creator, wrapindexed –
TOKWRITE creator –
TOKDUMP –
TOKSCRUB –
TXPOW – Queries and then sets power to 'input' dBm (+3 to -27 dBm)
CHANNEL x – Sets the channel to x (B to 1A, 15.411 to 26)
RECEIVE – Puts the device in RX mode (key press exits)
TRANSMIT x – Transmits x packets (infinite if 0)
BOOTLOAD – Launches the bootloader app
HELP – Prints this help menu
? – Also Prints this help menu

G. Modifications

- a) **Modifications to EUT**
No modifications were made to the EUT.
- b) **Modifications to Test Standard**
No modifications were made to the test standard.

H. Disposition of EUT

The test sample including all support equipment submitted to the Electro-Magnetic Compatibility Lab for testing was returned to System Planning Corporation upon completion of testing.

III. Electromagnetic Compatibility Criteria for Unintentional Radiators

Electromagnetic Compatibility Criteria

§ 15.107 Conducted Emissions Limits

Test Requirement(s): **15.107 (a)** Except for Class A digital devices, for equipment 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 Table 5. Compliance with this provision shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminals.

15.107 (b) For a Class A digital device 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 Table 5. Compliance with this provision shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminals. The lower limit applies at the band edges.

Frequency range (MHz)	Class A Conducted Limits (dB μ V)		*Class B Conducted Limits (dB μ V)	
	Quasi-Peak	Average	Quasi-Peak	Average
* 0.15- 0.45	79	66	66 - 56	56 - 46
0.45 - 0.5	79	66	56	46
0.5 - 30	73	60	60	50
Note 1 — The lower limit shall apply at the transition frequencies. Note 2 — The limit decreases linearly with the logarithm if the frequency in the range 0.15 MHz to 0.5 MHz. * -- Limits per Subsection 15.207(a).				

Table 5. Conducted Limits for Radio Frequency Devices calculated from FCC Part 15 Subsections 15.107(a) (b) and 15.207(a)

Test Results: The EUT was not applicable with the Class B requirement(s) of this section. The EUT is battery powered.

Radiated Emission Limits

§ 15.109 Radiated Emissions Limits

Test Requirement(s): **15.109 (a)** Except for Class A digital devices, the field strength of radiated emissions from unintentional radiators at a distance of 3 meters shall not exceed the Class B limits expressed in Table 6.

15.109 (b) The field strength of radiated emissions from a Class A digital device, as determined at a distance of 10 meters, shall not exceed the Class A limits expressed in Table 6.

Frequency (MHz)	Field Strength (dBμV/m)	
	§15.109 (b), Class A Limit (dBμV) @ 10m	§15.109 (a), Class B Limit (dBμV) @ 3m
30 - 88	39.00	40.00
88 - 216	43.50	43.50
216 - 960	46.40	46.00
Above 960	49.50	54.00

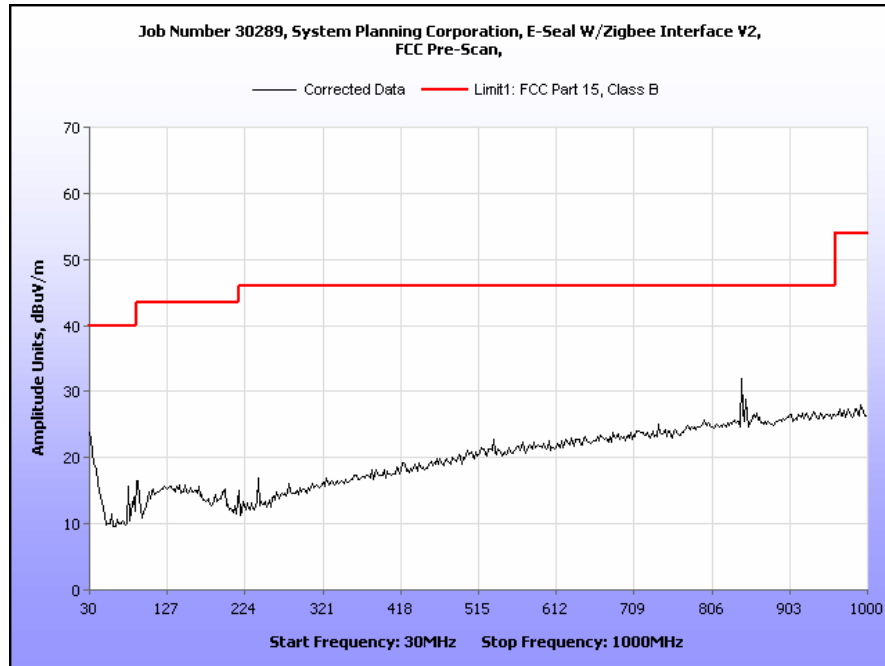
Table 6. Radiated Emissions Limits calculated from FCC Part 15, §15.109 (a) (b)

Test Procedures: The EUT was placed on a non-metallic table, 80 cm above the ground plane inside a semi-anechoic chamber. The method of testing and test conditions of ANSI C63.4 were used. An antenna was located 3 m from the EUT on an adjustable mast. A pre-scan was performed in order to find prominent radiated emissions. The EUT was rotated and the antenna height was varied between 1 m and 4 m in order to maximize the emissions. Measurements in both horizontal and vertical polarities were made and the plots were corrected for antenna correction factor and cable loss.

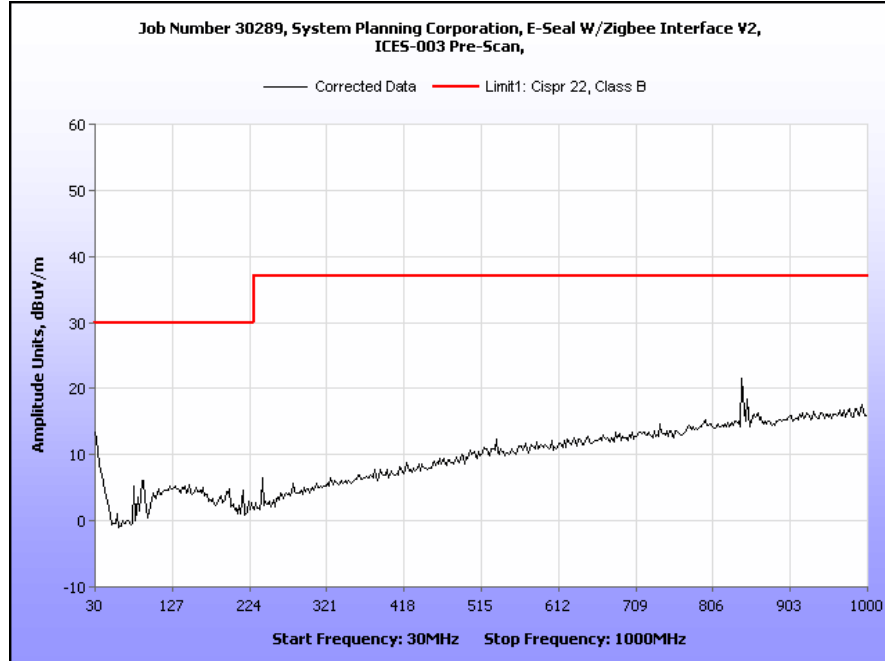
Test Results: The EUT was compliant with the Class B requirement(s) of this section. Since no peak emissions were within 10 dB of the quasi-peak limit, no further data was taken.

Test Engineer(s): Len Knight

Test Date(s): 01/19/11

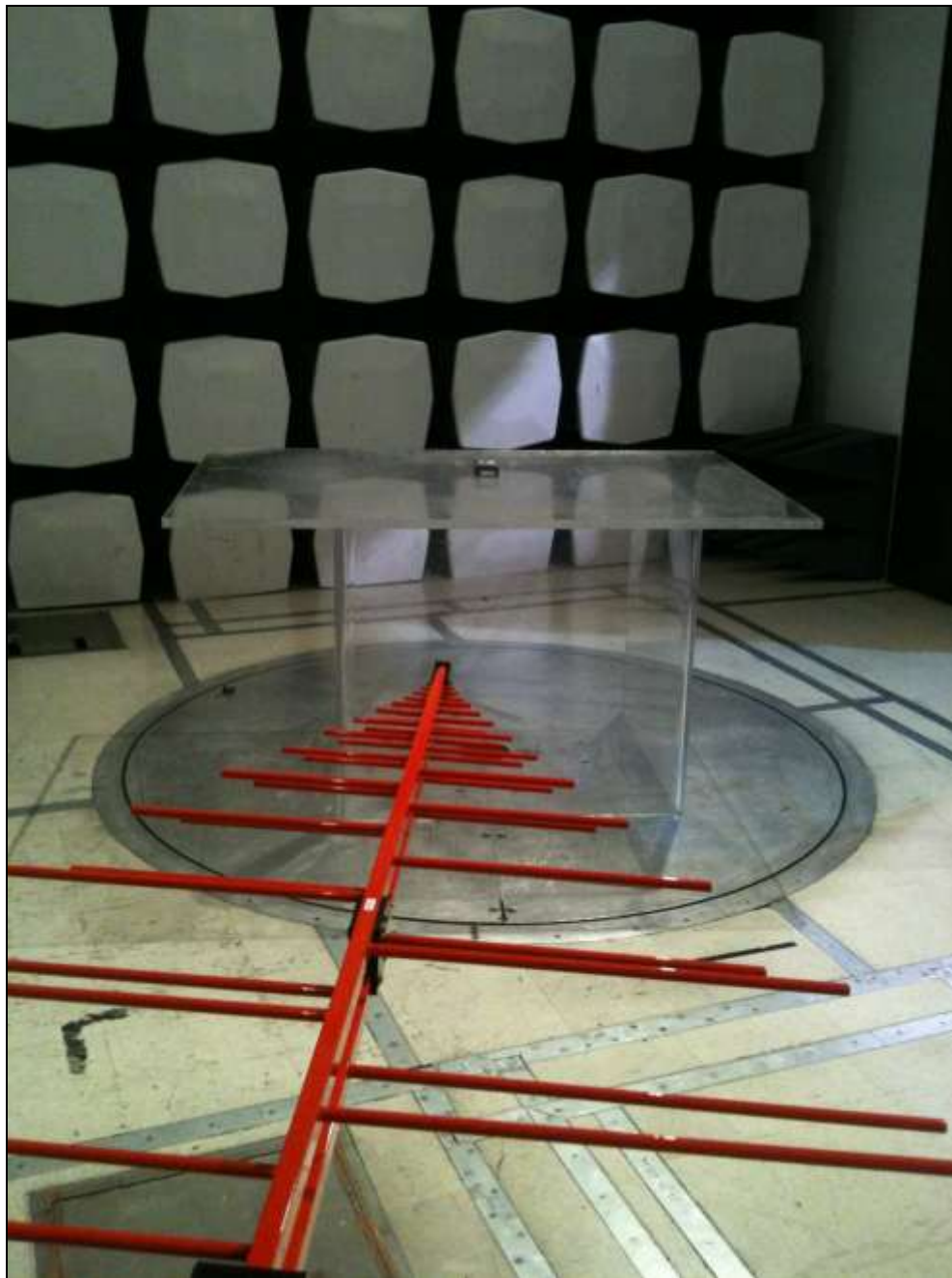


Plot 1. Radiated Emissions, Pre-Scan, FCC Limits



Plot 2. Radiated Emissions, Pre-Scan, ICES-003 Limits

Radiated Emission Limits Test Setup



Photograph 1. Radiated Emission, Test Setup

IV. Electromagnetic Compatibility Criteria for Intentional Radiators

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.203 Antenna Requirement

Test Requirement: **§ 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.

The structure and application of the EUT were analyzed to determine compliance with Section 15.203 of the Rules. Section 15.203 states that the subject device must meet at least one of the following criteria:

- a.) Antenna must be permanently attached to the unit.
- b.) Antenna must use a unique type of connector to attach to the EUT.
- c.) Unit must be professionally installed. Installer shall be responsible for verifying that the correct antenna is employed with the unit.

Results: The EUT as tested meets the criteria of §15.203. The EUT contains an integral antenna.

Test Engineer(s): Len Knight

Test Date(s): 01/18/11

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.207(a) Conducted Emissions Limits

Test Requirement(s): § 15.207 (a): 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 30MHz, shall not exceed the limits in the following table, as measured using a 50 μ H/50 Ω 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 frequency ranges.

Frequency range (MHz)	§ 15.207(a), Conducted Limit (dB μ V)	
	Quasi-Peak	Average
* 0.15- 0.45	66 - 56	56 - 46
0.45 - 0.5	56	46
0.5 - 30	60	50

Table 7. Conducted Limits for Intentional Radiators from FCC Part 15 § 15.207(a)

Test Results: The EUT was not applicable with this requirement. EUT is battery powered.

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(a)(2) 6 dB and 99% Bandwidth

Test Requirements: § 15.247(a)(2): Operation under the provisions of this section is limited to frequency hopping and digitally modulated intentional radiators that comply with the following provisions:

For systems using digital modulation techniques, the EUT may operate in the 902-928 MHz, 2400-2483.5 MHz and 5725-5850 MHz bands. The minimum 6dB bandwidth shall be at least 500 kHz.

Test Procedure: The transmitter was on and transmitting at the highest output power. The bandwidth of the fundamental frequency was measured with the spectrum analyzer using a RBW approximately 1% of the total emission bandwidth, VBW > RBW. The 6 dB Bandwidth was measured and recorded. The measurements were performed on the low, mid and high channels.

Test Results The EUT was compliant with § 15.247 (a)(2).

The 6 dB and 99% Bandwidth was determined from the plots on the following pages.

Test Engineer(s): Len Knight

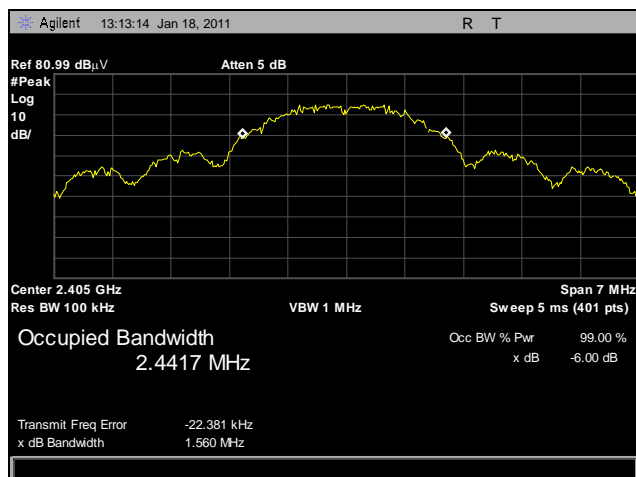
Test Date(s): 01/18/11

Occupied Bandwidth Test Results

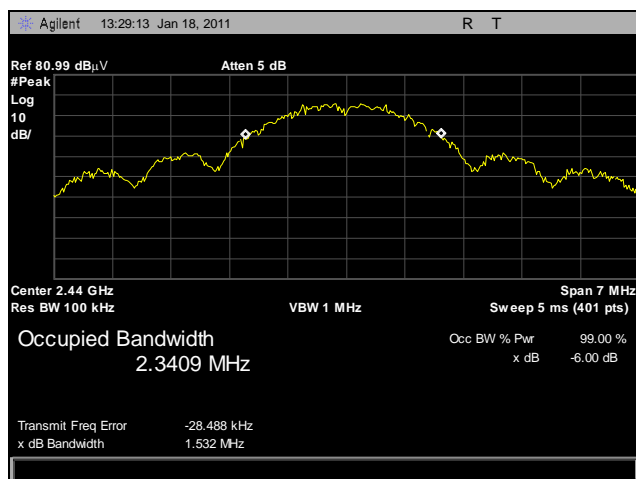
	Channel	Frequency (MHz)	6 dB (MHz)	99% (MHz)
Low	11	2405	1.560	2.453
Mid	18	2440	1.532	2.494
High	25	2475	1.392	2.352

Table 8. Occupied Bandwidth, Test Results

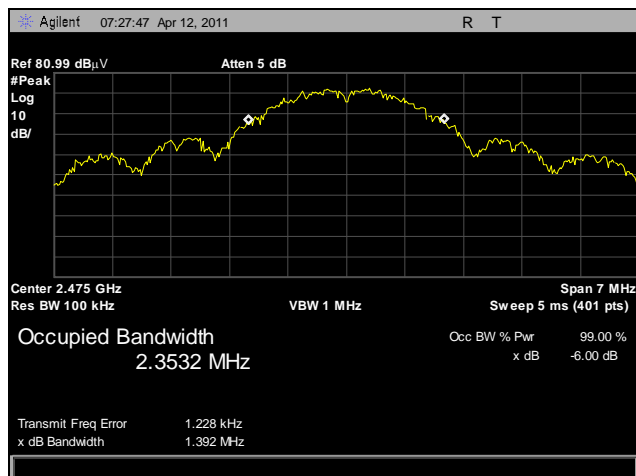
Occupied Bandwidth Test Results



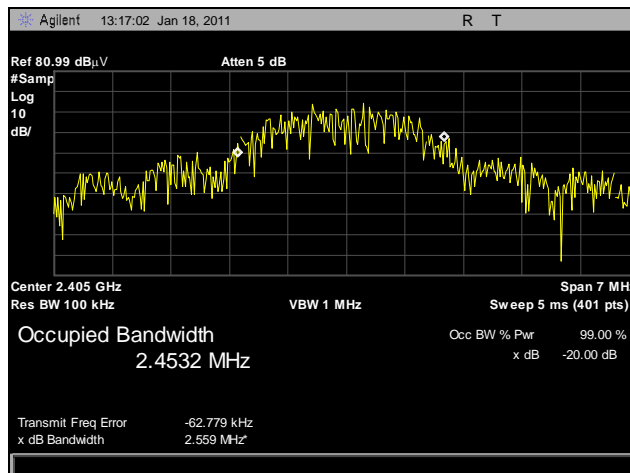
Plot 3. 6 dB Bandwidth, Low Channel



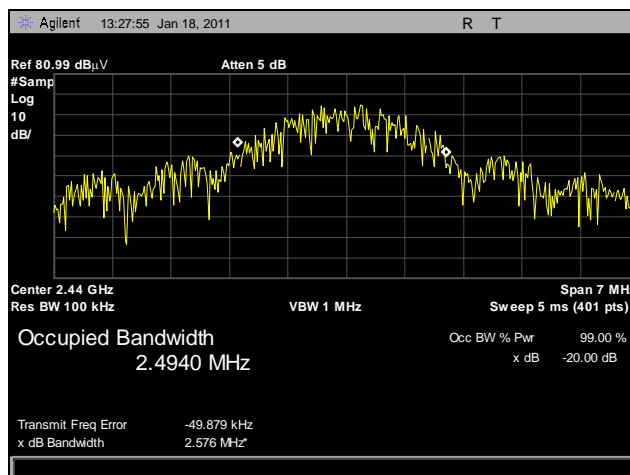
Plot 4. 6 dB Bandwidth, Mid Channel



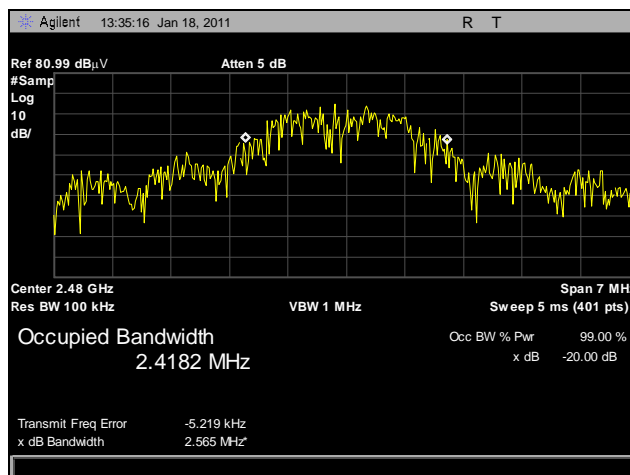
Plot 5. 6 dB Bandwidth, High Channel



Plot 6. 99% Occupied Bandwidth, Low Channel



Plot 7. 99% Occupied Bandwidth, Mid Channel



Plot 8. 99% Occupied Bandwidth, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(b) Peak Power Output

Test Requirements: §15.247(b): The maximum peak output power of the intentional radiator shall not exceed the following:

Digital Transmission Systems (MHz)	Output Limit (Watts)
902-928	1.000
2400-2483.5	1.000
5725- 5850	1.000

Table 9. Output Power Requirements from §15.247(b)

§15.247(c): if transmitting antennas of directional gain greater than 6 dBi are used the peak output power from the intentional radiator shall be reduced below the stated values in the Table 9, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

Systems operating in the 2400 – 2483.5 MHz band and using a point to point application may employ transmitting antennas with directional gain greater than 6 dBi provided the maximum peak output power of the intentional radiator is reduced by 1 dB for every 3 dB that the directional gain of the antenna exceeds 6 dBi.

Test Procedure: Since the EUT had an integral antenna, Peak Power Measurements were made radiated. The guidance of FCC KDB 558074 was used.

RBW > 6 dB bandwidth
RBW = VBW = 3 MHz

The plots presented were corrected for antenna correction factor, cable loss, distance correction and conversion from field strength to EIRP.

Test Results: The EUT was compliant with the Peak Power Output limits of §15.247(b).

Test Engineer(s): Len Knight

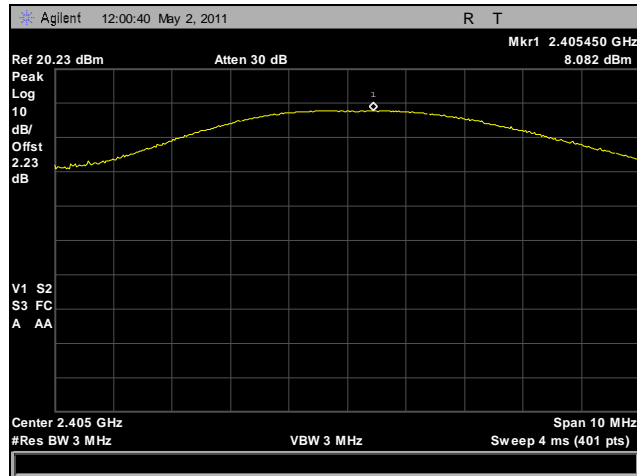
Test Date(s): 05/04/11

Peak Power Output Test Results

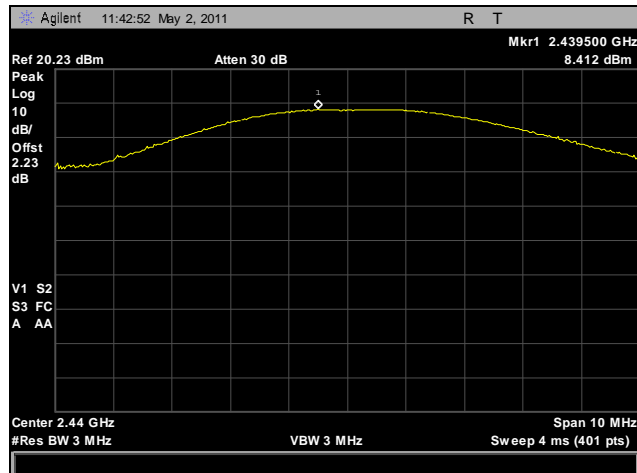
Channel	Frequency (MHz)	Power (dBm)
11	2405	8.082
18	2440	8.412
25	2475	8.036

Table 10. Peak Power Output, Test Results

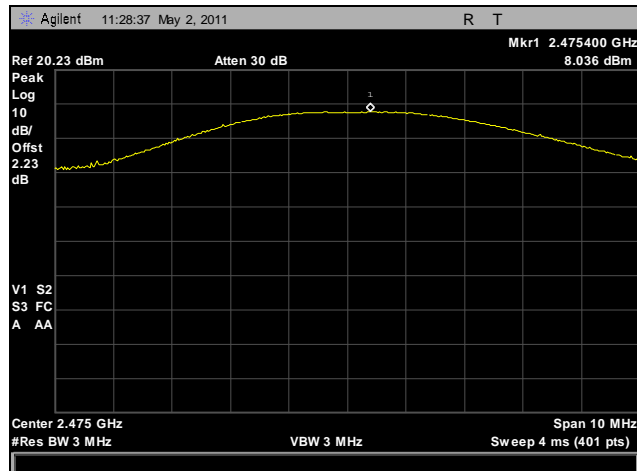
Peak Power Output Test Results



Plot 9. Peak Power Output, Low Channel



Plot 10. Peak Power Output, Mid Channel



Plot 11. Peak Power Output, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(d) Radiated Spurious Emissions Requirements and Band Edge

Test Requirements: §15.247(d); §15.205: Emissions outside the frequency band.

§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. Attenuation below the general limits specified in § 15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in § 15.205(a), must also comply with the radiated emission limits specified in § 15.209(a).

§15.205(a): Except as shown in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090–0.110-----	16.42–16.423	399.9–410	4.5–5.15
¹ 0.495–0.505-----	16.69475–16.69525	608–614	5.35–5.46
2.1735–2.1905-----	16.80425–16.80475	960–1240	7.25–7.75
4.125–4.128-----	25.5–25.67	1300–1427	8.025–8.5
4.17725–4.17775-----	37.5–38.25	1435–1626.5	9.0–9.2
4.20725–4.20775-----	73–74.6	1645.5–1646.5	9.3–9.5
6.215–6.218-----	74.8–75.2	1660–1710	10.6–12.7
6.26775–6.26825-----	108–121.94	1718.8–1722.2	13.25–13.4
6.31175–6.31225-----	123–138	2200–2300	14.47–14.5
8.291–8.294-----	149.9–150.05	2310–2390	15.35–16.2
8.362–8.366-----	156.52475–156.52525	2483.5–2500	17.7–21.4
8.37625–8.38675-----	156.7–156.9	2655–2900	22.01–23.12
8.41425–8.41475-----	162.0125–167.17	3260–3267	23.6–24.0
12.29–12.293-----	167.72–173.2	3332–3339	31.2–31.8
12.51975–12.52025-----	240–285	3345.8–3358.36	43–36.5
12.57675–12.57725-----	322–335.4	3600–4400	(²)

Table 11. Restricted Bands of Operation

¹ Until February 1, 1999, this restricted band shall be 0.490 – 0.510 MHz.

² Above 38.6

Test Requirement(s): § 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 Table 12.

Frequency (MHz)	§ 15.209(a), Radiated Emission Limits (dBµV) @ 3m
30 - 88	40.00
88 - 216	43.50
216 - 960	46.00
Above 960	54.00

Table 12. Radiated Emissions Limits Calculated from FCC Part 15, § 15.209 (a)

Test Procedures: The transmitter was turned on. Measurements were performed of the low, mid and high Channels. The EUT was rotated orthogonally through all three axes. Plots shown are corrected for both antenna correction factor and distance and compared to a 3 m limit line. The frequency range from 30 MHz to 26.5 GHz was evaluated.

Test Results: The EUT was compliant with the Radiated Spurious Emission limits of § 15.247(d).

Test Engineer(s): Len Knight

Test Date(s): 05/10/11

Harmonic Emissions Requirements – Radiated

Channel 11	Frequency	Corrected Measurement (dBuV/m)		Limit (dBuV/m)		Margin (dB)	
Harmonic	(GHz)	Peak	Average	Peak	Average	Peak	Average
2nd	4.81	53.96	50.76	74	54	-20.04	-3.24
3rd	7.216	50.45	41.28	74	54	-23.55	-12.72
4th	9.618	52.78	42.56	74	54	-21.22	-11.44

Table 13. Radiated Harmonic Emissions, Low Channel

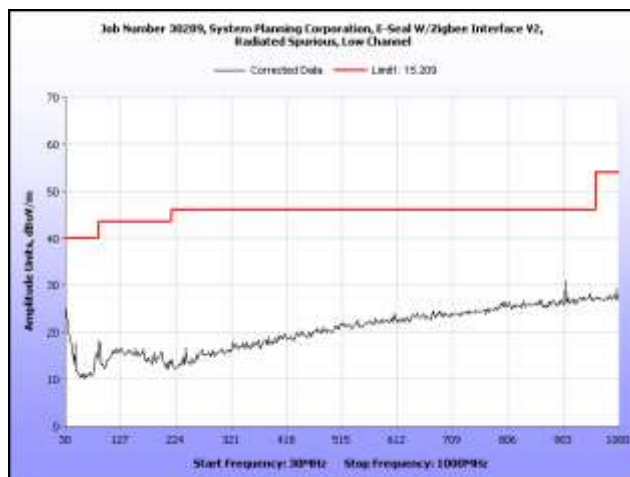
Channel 17	Frequency	Corrected Measurement (dBuV/m)		Limit (dBuV/m)		Margin (dB)	
Harmonic	(GHz)	Peak	Average	Peak	Average	Peak	Average
2nd	4.88	52.97	44.35	74	54	-21.03	-9.65
3rd	7.3210	50.18	40.82	74	54	-23.82	-13.18
4th	9.758	54.5	44.54	74	54	-19.5	-9.46

Table 14. Radiated Harmonic Emissions, Mid Channel

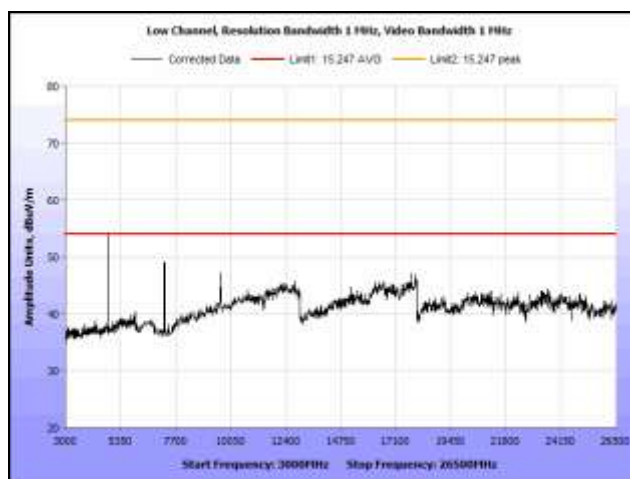
Channel 25	Frequency	Corrected Measurement (dBuV/m)		Limit (dBuV/m)		Margin (dB)	
Harmonic	(GHz)	Peak	Average	Peak	Average	Peak	Average
2nd	4.949	51.19	41.83	74	54	-22.81	-12.17
3rd	7.426	46.98	34.02	74	54	-27.02	-19.98
4th	9.898	50.13	39.83	74	54	-64.102	-14.17

Table 15. Radiated Harmonic Emissions, High Channel

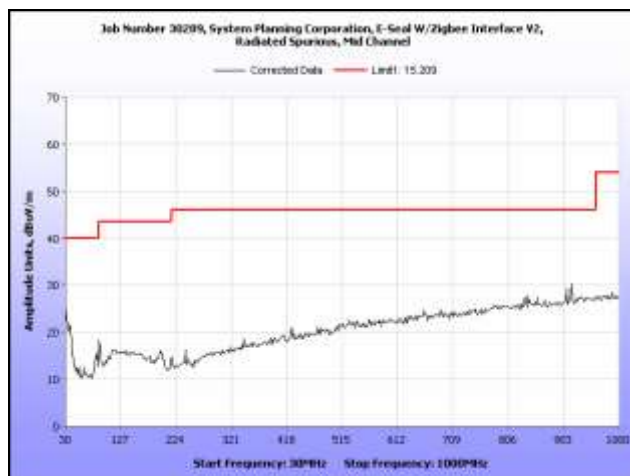
Radiated Spurious Emissions Test Results



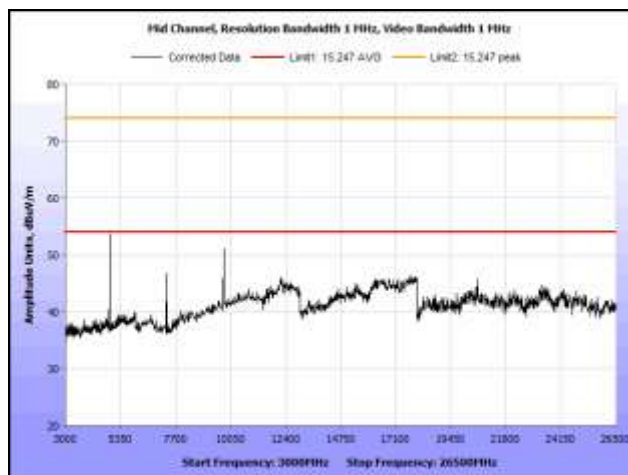
Plot 12. Radiated Spurious Emissions, Low Channel, 30 MHz – 1 GHz



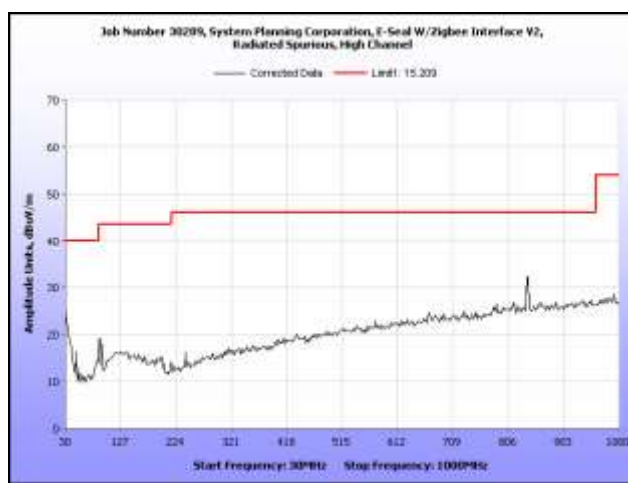
Plot 13. Radiated Spurious Emissions, Low Channel, 3 GHz – 26.5 GHz



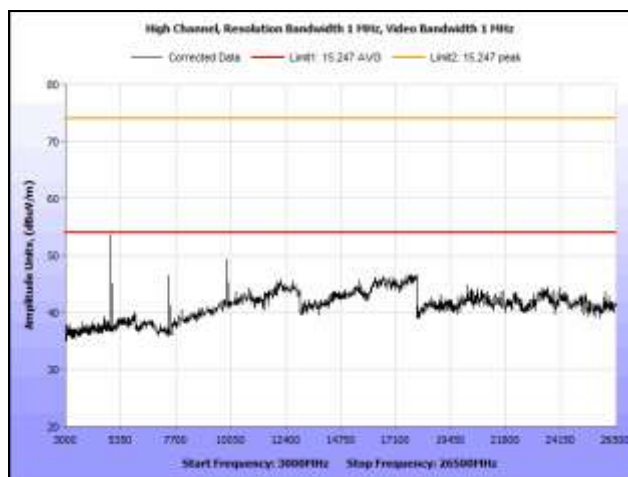
Plot 14. Radiated Spurious Emissions, Mid Channel, 30 MHz – 1 GHz



Plot 15. Radiated Spurious Emissions, Mid Channel, 3 GHz – 26.5 GHz



Plot 16. Radiated Spurious Emissions, High Channel, 30 MHz – 1 GHz

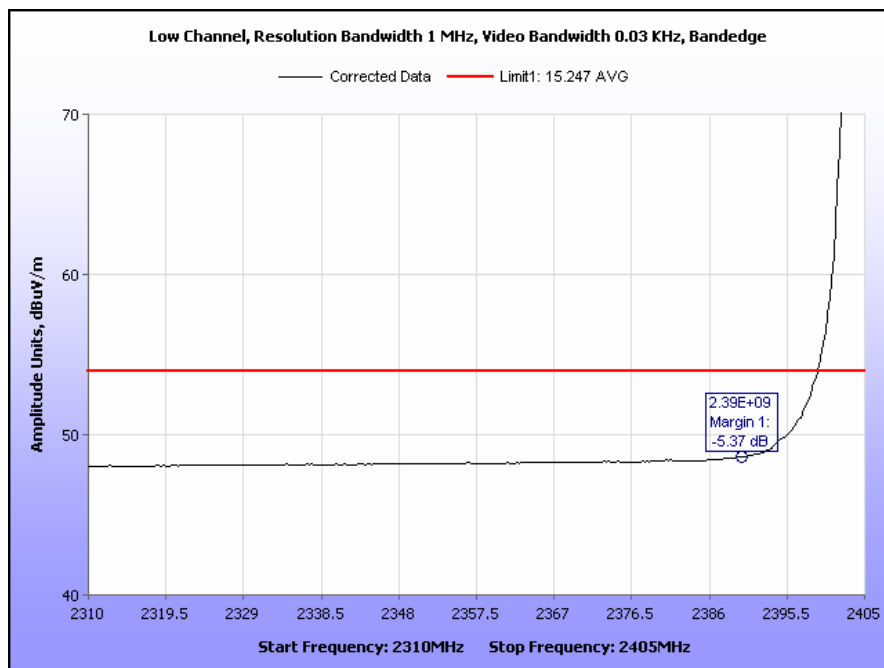


Plot 17. Radiated Spurious Emissions, High Channel, 3 GHz – 26.5 GHz

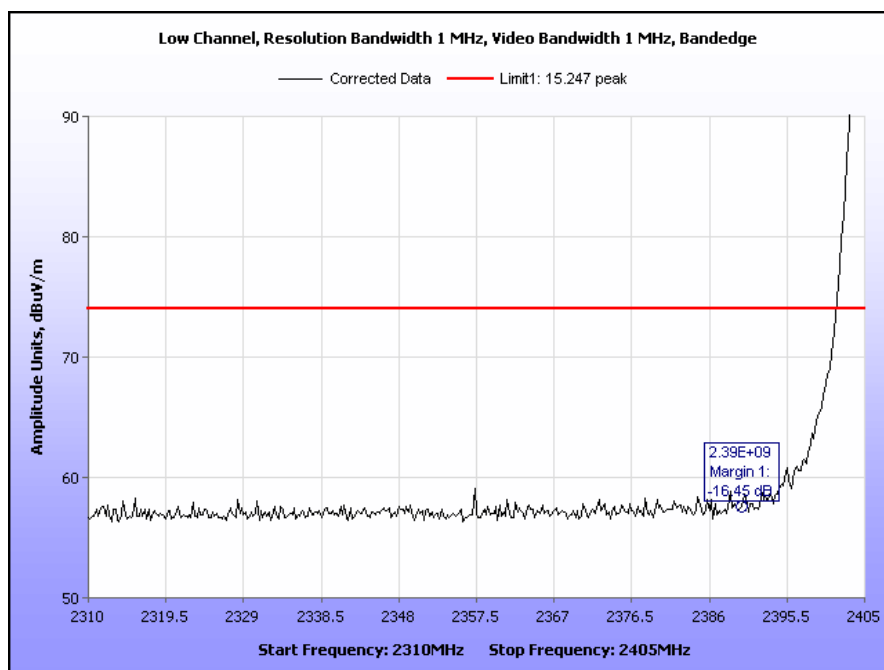
Radiated Band Edge Measurements

Test Procedures:

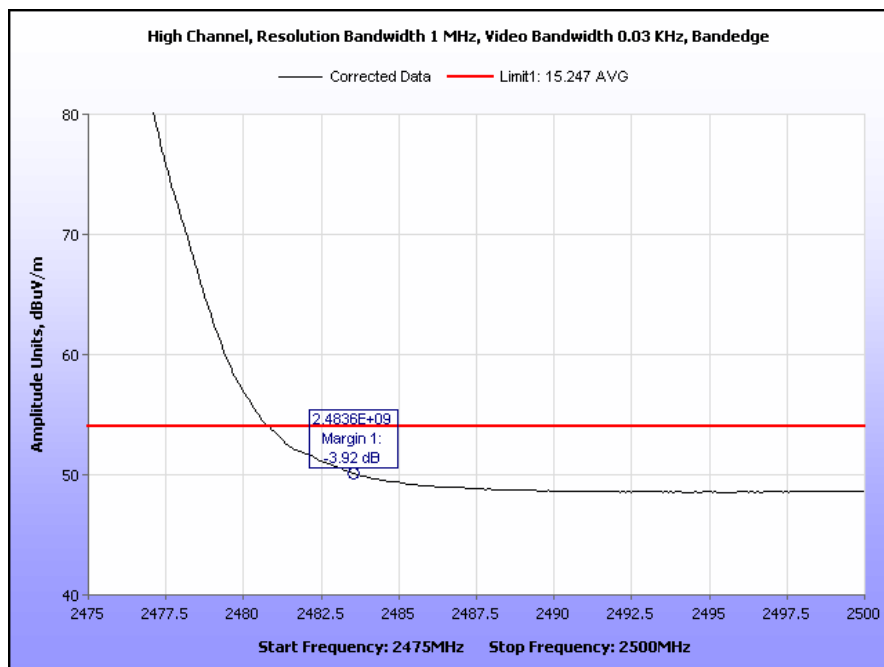
The transmitter was turned on. Measurements were performed of the low and high Channels. The EUT was rotated orthogonally through all three axes. Plots shown are corrected for both antenna correction factor and distance and compared to a 3 m limit line.



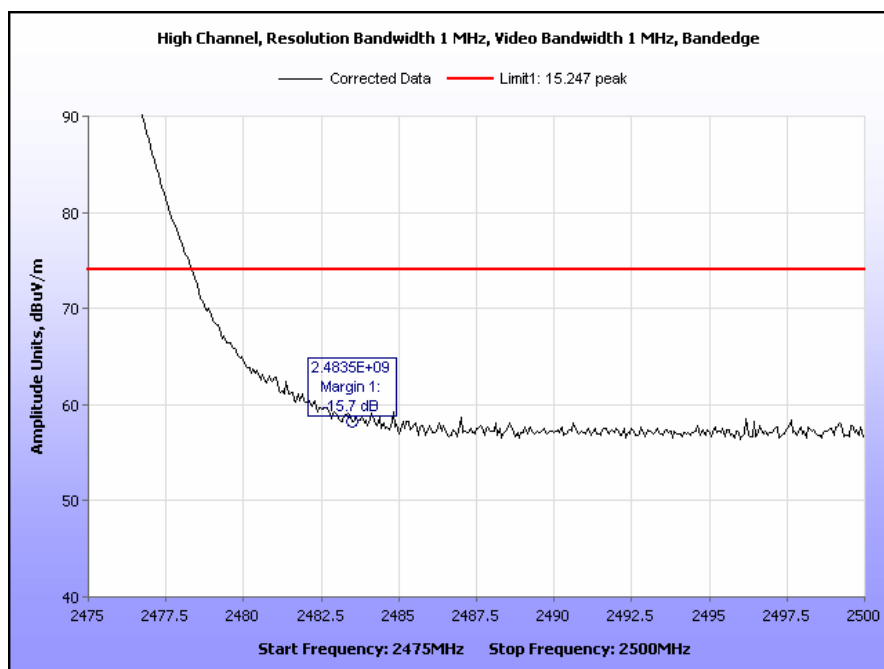
Plot 18. Radiated Restricted Band Edge, Low Channel, Average



Plot 19. Radiated Restricted Band Edge, Low Channel, Peak

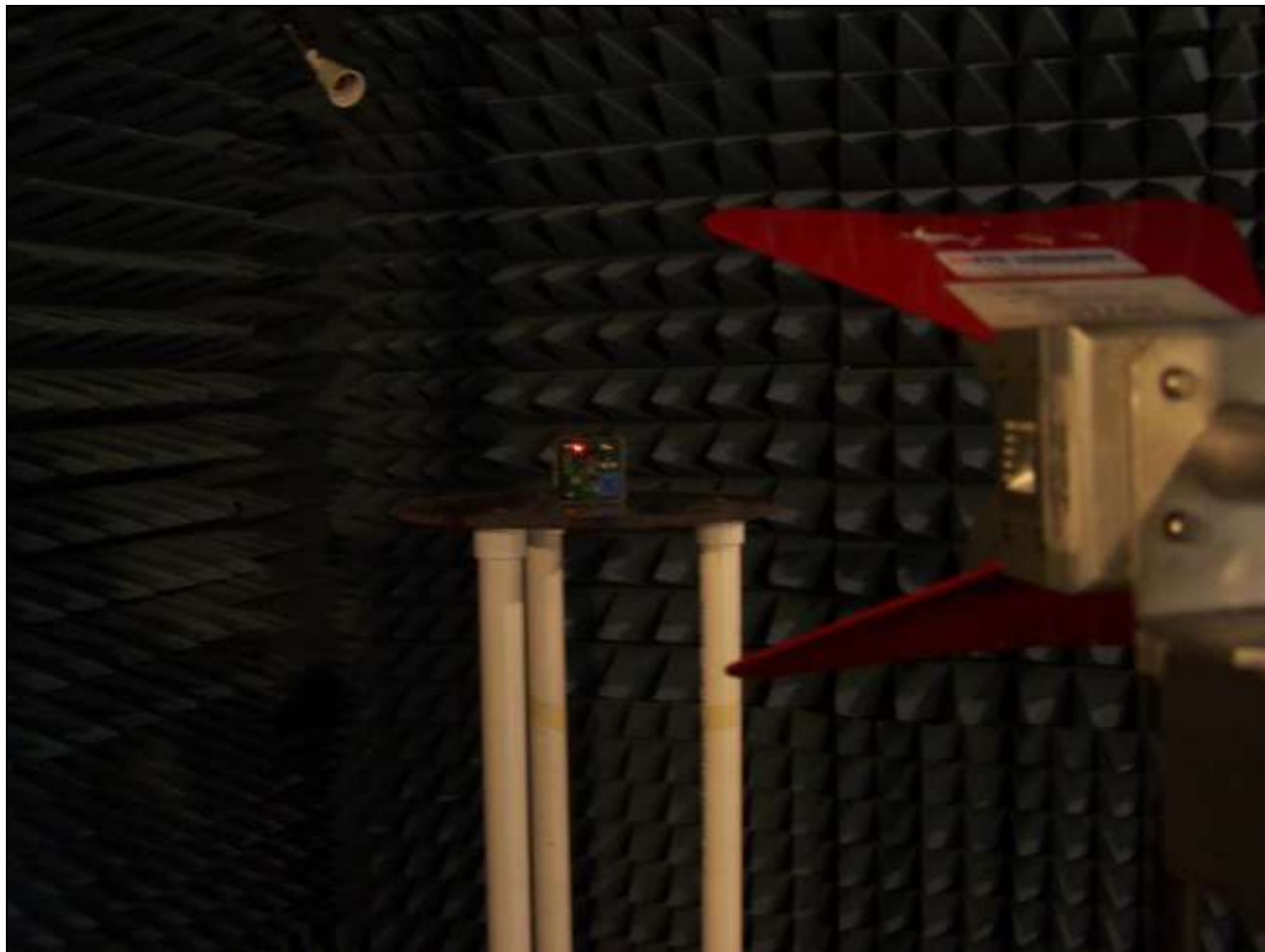


Plot 20. Radiated Restricted Band Edge, High Channel, Average



Plot 21. Radiated Restricted Band Edge, High Channel, Peak

Radiated Spurious Emissions Test Setup



Photograph 2. Radiated Spurious Emissions, Test Setup

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(d) RF Conducted Spurious Emissions Requirements and Band Edge

Test Requirement: **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.

Test Procedure: For intentional radiators with a digital device portion which operates below 10 GHz, the spectrum was investigated as per §15.33(a)(1) and §15.33(a)(4); i.e., the lowest RF signal generated or used in the device up to the 10th harmonic of the highest fundamental frequency or to 40 GHz, whichever is lower.

Since the EUT had an integral antenna, conducted measurements could not be performed. Measurements needed to be taken radiated. An antenna was located 3 m away from the EUT and plots were taken. The EUT was rotated through all three orthogonal axes. The plots were corrected for both antenna correction factor and cable loss.

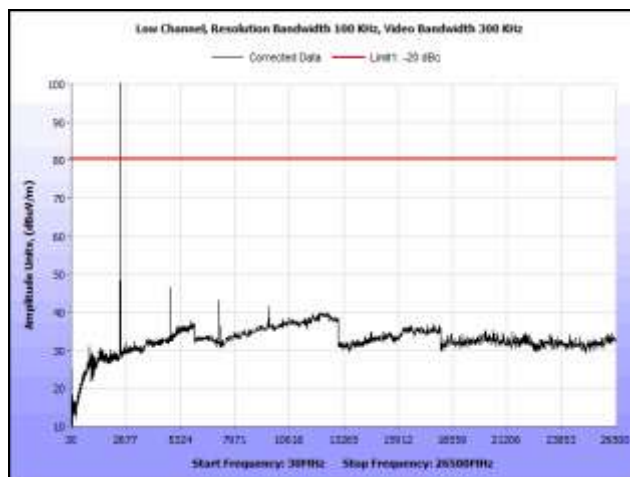
See following pages for detailed test results with RF Conducted Spurious Emissions.

Test Results: The EUT was compliant with the Spurious Emission limits of **§15.247(d)**.

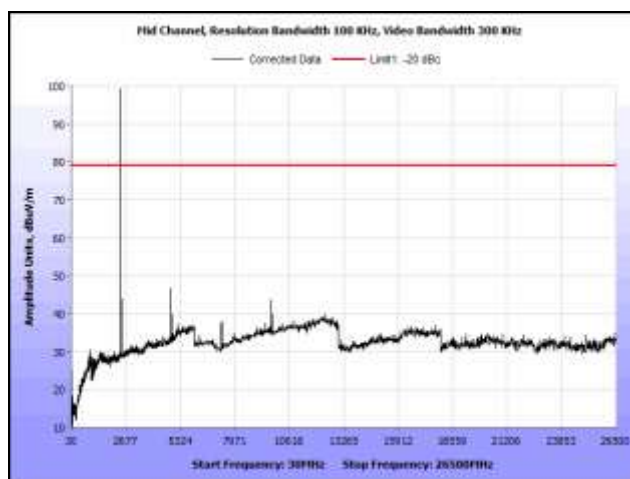
Test Engineer(s): Len Knight

Test Date(s): 05/05/11

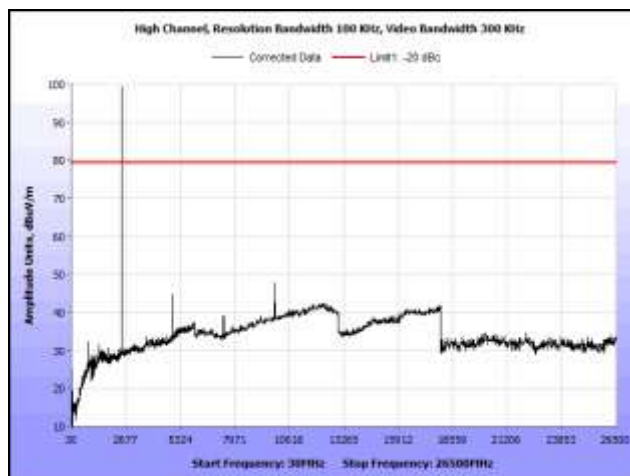
Spurious Emissions Test Results



Plot 22. Spurious Emissions, Low Channel



Plot 23. Spurious Emissions, Mid Channel



Plot 24. Spurious Emissions, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(e) Peak Power Spectral Density

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

Test Procedure: Since the EUT had an integral antenna, Peak Power Measurements were made radiated. The guidance of FCC KDB 558074 was used. The plots presented were corrected for antenna correction and conversion from field strength to EIRP.

Test Results: The EUT was compliant with the peak power spectral density limits of § 15.247 (e).

The peak power spectral density was determined from plots on the following page(s).

Test Engineer: Len Knight

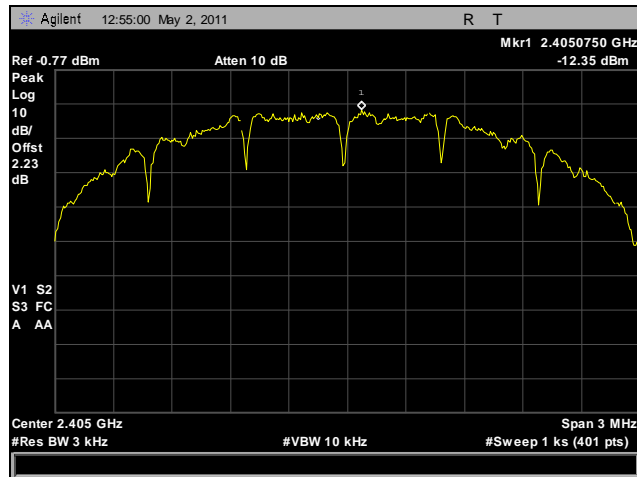
Test Date: 05/04/11

Peak Power Spectral Density Test Results

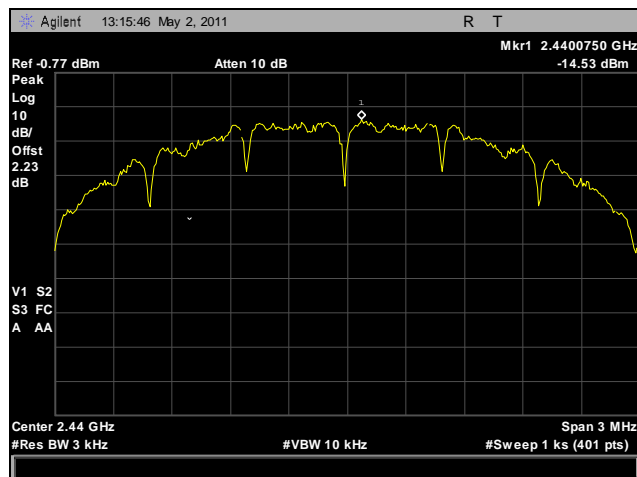
Channel	Frequency (MHz)	PSD (dBm)	Limit (dBm)
11	2405	-12.35	8
18	2440	-14.53	8
25	2475	-11.48	8

Table 16. Peak Power Spectral Density, Test Results

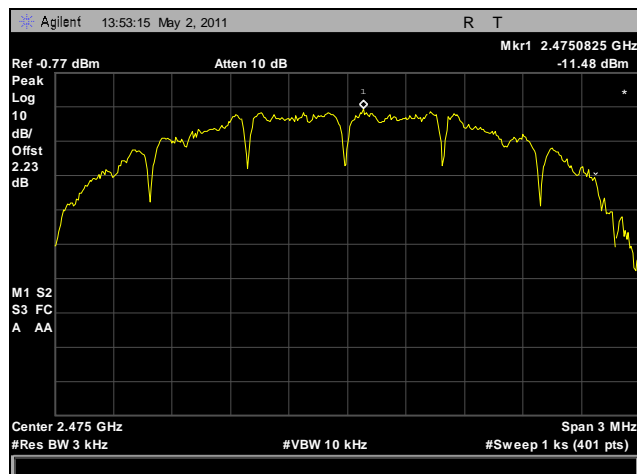
Peak Power Spectral Density



Plot 25. Peak Power Spectral Density, Low Channel



Plot 26. Peak Power Spectral Density, Mid Channel



Plot 27. Peak Power Spectral Density, High Channel

Electromagnetic Compatibility Criteria for Intentional Radiators

§ 15.247(i) Maximum Permissible Exposure

RF Exposure Requirements: §1.1307(b)(1) and §1.1307(b)(2): 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 levels in excess of the Commission's guidelines.

RF Radiation Exposure Limit: §1.1310: As specified in this section, the Maximum Permissible Exposure (MPE) Limit shall be used to evaluate the environmental impact of human exposure to radiofrequency (RF) radiation as specified in Sec. 1.1307(b), except in the case of portable devices which shall be evaluated according to the provisions of Sec. 2.1093 of this chapter.

MPE Limit Calculation: EUT's operating frequencies @ 2400-2483.5 MHz; highest power EIRP = 8.412 dBm (peak) therefore, **Limit for Uncontrolled exposure: 1 mW/cm² or 10 W/m²**

Equation from page 18 of OET 65, Edition 97-01

$$S = PG / 4\pi R^2 \quad \text{or} \quad R = \sqrt{PG / 4\pi S}$$

where, R = Distance (20cm)
P = Power Input to antenna
G = Antenna Gain
PG ≡ EIRP (6.937 mW)

$$\begin{aligned} S &= PG / 4\pi R^2 \\ S &= 6.937 / 4\pi(400) \\ S &= 0.00138 \text{ mW/cm}^2 \end{aligned}$$

Electromagnetic Compatibility Criteria for Intentional Radiators

RSS-GEN Receiver Spurious Emissions Requirements

Test Requirements: The following receiver spurious emission limits shall be complied with:

- (a) If a radiated measurement is made, all spurious emissions shall comply with the limits of Table 17.

Spurious Frequency (MHz)	Field Strength (microvolt/m at 3 metres)
30 – 88	100
88 – 216	150
216 – 960	200
Above 960	500

Table 17. Spurious Emission Limits for Receivers

- (b) If a conducted measurement is made, no spurious output signals appearing at the antenna terminals shall exceed 2 nanowatts per any 4 kHz spurious frequency in the band 30-1000 MHz, or 5 nanowatts above 1 GHz.

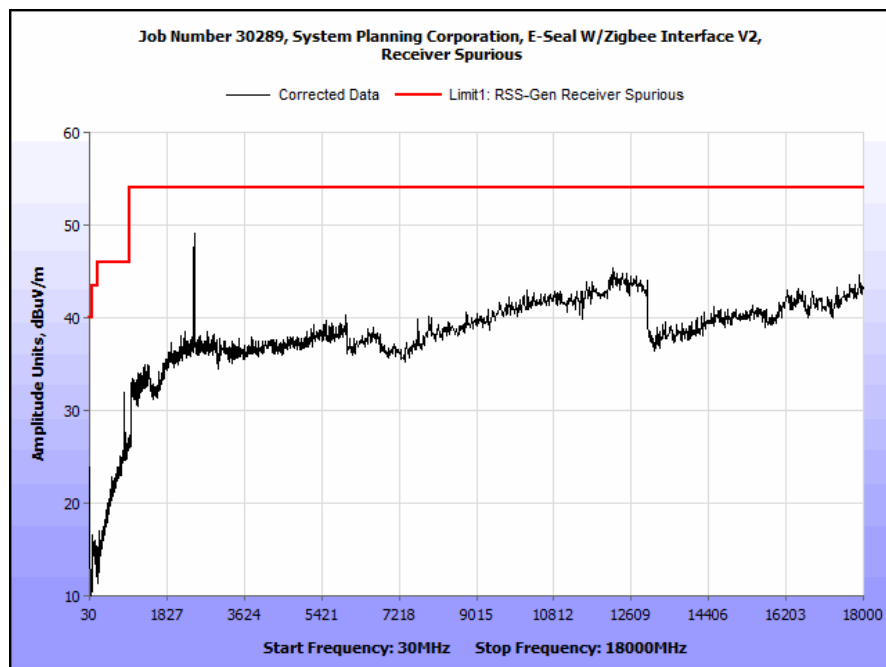
Test Procedures: The EUT was programmed for receive mode only. Measurements were performed radiated. The EUT was rotated about all three horizontal axes. The final emissions plot is corrected for antenna correction factor, cable loss, and distance correction.

Test Results: Equipment is compliant with the Receiver Spurious Emissions Requirements of RSS-GEN. Highest Receiver Spurious is 49.17 dBuV/m at 2465 MHz at 3m.

Test Engineer(s): Len Knight

Test Date(s): 05/09/11

Conducted Receiver Spurious Emissions



Plot 28. Receiver Spurious Emissions

IV. Test Equipment

Test Equipment

Calibrated test equipment utilized during testing was maintained in a current state of calibration per the requirements of ANSI/NCSL Z540-1-1994 and ANSI/ISO/IEC 17025:2000.

MET Asset #	Equipment	Manufacturer	Model	Last Cal Date	Cal Due Date
1T4483	ANTENNA; HORN	ETS-LINDGREN	3117	06/08/2010	06/08/2011
1T4409	EMI RECEIVER	ROHDE & SCHWARZ	ESIB7	05/25/2010	05/25/2011
1T4300	SEMI-ANECHOIC CHAMBER # 1	EMC TEST SYSTEMS	NONE	08/23/2010	08/23/2013
1T4627	THERMO/HYGROMETER	CONTROL COMPANY	S6-627-9	10/09/2009	10/09/2011
1T4751	ANTENNA - BILOG	SUNOL SCIENCES	JB6	11/03/2010	11/03/2011
1T2511	ANTENNA; HORN	EMCO	3115	08/31/2010	08/31/2011
1T4612	ESA-E SERIES SPECTRUM ANALYZER	AGILENT	E4407B	09/27/2010	09/27/2011
1T4752	PRE-AMPLIFIER	MITEQ	JS44-18004000-35-8P	SEE NOTE	
1T4442	PRE-AMPLIFIER, MICROWAVE	MITEQ	AFS42-01001800-30-10P	SEE NOTE	
1T4744	ANTENNA, HORN	ETS-LINDGREN	3116	05/27/2010	05/27/2011

Table 18. Test Equipment List

Note: Functionally tested equipment is verified using calibrated instrumentation at the time of testing.



V. Certification & User's Manual Information

Certification & User's Manual Information

A. Certification Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 2, Subpart I — Marketing of Radio frequency devices:

§ 2.801 Radio-frequency device defined.

As used in this part, a radio-frequency device is any device which in its operation is capable of Emitting radio-frequency energy by radiation, conduction, or other means. Radio- frequency devices include, but are not limited to:

- (a) The various types of radio communication transmitting devices described throughout this chapter.
- (b) *The incidental, unintentional and intentional radiators defined in Part 15 of this chapter.*
- (c) The industrial, scientific, and medical equipment described in Part 18 of this chapter.
- (d) Any part or component thereof which in use emits radio-frequency energy by radiation, conduction, or other means.

§ 2.803 Marketing of radio frequency devices prior to equipment authorization.

- (a) Except as provided elsewhere in this chapter, no person shall sell or lease, or offer for sale or lease (including advertising for sale or lease), or import, ship or distribute for the purpose of selling or leasing or offering for sale or lease, any radio frequency device unless:
 - (1) In the case of a device subject to certification, such device has been authorized by the Commission in accordance with the rules in this chapter and is properly identified and labeled as required by §2.925 and other relevant sections in this chapter; or
 - (2) In the case of a device that is not required to have a grant of equipment authorization issued by the Commission, but which must comply with the specified technical standards prior to use, such device also complies with all applicable administrative (including verification of the equipment or authorization under a Declaration of Conformity, where required), technical, labeling and identification requirements specified in this chapter.
- (d) Notwithstanding the provisions of paragraph (a) of this section, the offer for sale solely to business, commercial, industrial, scientific or medical users (but not an offer for sale to other parties or to end users located in a residential environment) of a radio frequency device that is in the conceptual, developmental, design or pre-production stage is permitted prior to equipment authorization or, for devices not subject to the equipment authorization requirements, prior to a determination of compliance with the applicable technical requirements *provided* that the prospective buyer is advised in writing at the time of the offer for sale that the equipment is subject to the FCC rules and that the equipment will comply with the appropriate rules before delivery to the buyer or to centers of distribution.

- (e)(1) Notwithstanding the provisions of paragraph (a) of this section, prior to equipment authorization or determination of compliance with the applicable technical requirements any radio frequency device may be operated, but not marketed, for the following purposes and under the following conditions:
- (i) *Compliance testing*;
 - (ii) Demonstrations at a trade show provided the notice contained in paragraph (c) of this section is displayed in a conspicuous location on, or immediately adjacent to, the device;
 - (iii) Demonstrations at an exhibition conducted at a business, commercial, industrial, scientific or medical location, but excluding locations in a residential environment, provided the notice contained in paragraphs (c) or (d) of this section, as appropriate, is displayed in a conspicuous location on, or immediately adjacent to, the device;
 - (iv) Evaluation of product performance and determination of customer acceptability, provided such operation takes place at the manufacturer's facilities during developmental, design or pre-production states; or
 - (v) Evaluation of product performance and determination of customer acceptability where customer acceptability of a radio frequency device cannot be determined at the manufacturer's facilities because of size or unique capability of the device, provided the device is operated at a business, commercial, industrial, scientific or medical user's site, but not at a residential site, during the development, design or pre-production stages.
- (e)(2) For the purpose of paragraphs (e)(1)(iv) and (e)(1)(v) of this section, the term *manufacturer's facilities* includes the facilities of the party responsible for compliance with the regulations and the manufacturer's premises, as well as the facilities of other entities working under the authorization of the responsible party in connection with the development and manufacture, but not the marketing, of the equipment.
- (f) For radio frequency devices subject to verification and sold solely to business, commercial, industrial, scientific and medical users (excluding products sold to other parties or for operation in a residential environment), parties responsible for verification of the devices shall have the option of ensuring compliance with the applicable technical specifications of this chapter at each end user's location after installation, provided that the purchase or lease agreement includes a proviso that such a determination of compliance be made and is the responsibility of the party responsible for verification of the equipment.

Certification & User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 2, Subpart J — Equipment Authorization Procedures:

§ 2.901 Basis and Purpose

- (a) In order to carry out its responsibilities under the Communications Act and the various treaties and international regulations, and in order to promote efficient use of the radio spectrum, the Commission has developed technical standards for radio frequency equipment and parts or components thereof. The technical standards applicable to individual types of equipment are found in that part of the rules governing the service wherein the equipment is to be operated.¹ *In addition to the technical standards provided, the rules governing the service may require that such equipment be verified by the manufacturer or importer, be authorized under a Declaration of Conformity, or receive an equipment authorization from the Commission by one of the following procedures: certification or registration.*
- (b) The following sections describe the verification procedure, the procedure for a Declaration of Conformity, and the procedures to be followed in obtaining certification from the Commission and the conditions attendant to such a grant.

§ 2.907 Certification.

- (a) Certification is an equipment authorization issued by the Commission, based on representation and test data submitted by the applicant.
- (b) Certification attaches to all units subsequently marketed by the grantee which are identical (see Section 2.908) to the sample tested except for permissive changes or other variations authorized by the Commission pursuant to Section 2.1043.

¹ In this case, the equipment is subject to the rules of Part 15. More specifically, the equipment falls under Subpart B (of Part 15), which deals with unintentional radiators.

Certification & User's Manual Information

§ 2.948 Description of measurement facilities.

- (a) Each party making measurements of equipment that is subject to an equipment authorization under Part 15 or Part 18 of this chapter, regardless of whether the measurements are filed with the Commission or kept on file by the party responsible for compliance of equipment marketed within the U.S. or its possessions, shall compile a description of the measurement facilities employed.
 - (1) If the measured equipment is subject to the verification procedure, the description of the measurement facilities shall be retained by the party responsible for verification of the equipment.
 - (i) *If the equipment is verified through measurements performed by an independent laboratory, it is acceptable for the party responsible for verification of the equipment to rely upon the description of the measurement facilities retained by or placed on file with the Commission by that laboratory. In this situation, the party responsible for the verification of the equipment is not required to retain a duplicate copy of the description of the measurement facilities.*
 - (ii) If the equipment is verified based on measurements performed at the installation site of the equipment, no specific site calibration data is required. It is acceptable to retain the description of the measurement facilities at the site at which the measurements were performed.
 - (2) If the equipment is to be authorized by the Commission under the certification procedure, the description of the measurement facilities shall be filed with the Commission's Laboratory in Columbia, Maryland. The data describing the measurement facilities need only be filed once but must be updated as changes are made to the measurement facilities or as otherwise described in this section. At least every three years, the organization responsible for filing the data with the Commission shall certify that the data on file is current.

Certification & User's Manual Information

1. Label and User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 15, Subpart A — General:

§ 15.19 Labeling requirements.

(a) *In addition to the requirements in Part 2 of this chapter, a device subject to certification or verification shall be labeled as follows:*

- (1) Receivers associated with the operation of a licensed radio service, e.g., FM broadcast under Part 73 of this chapter, land mobile operation under Part 90, etc., shall bear the following statement in a conspicuous location on the device:

This device complies with Part 15 of the FCC Rules. Operation is subject to the condition that this device does not cause harmful interference.

- (2) A stand-alone cable input selector switch, shall bear the following statement in a conspicuous location on the device:

This device is verified to comply with Part 15 of the FCC Rules for use with cable television service.

- (3) All other devices shall bear the following statement in a conspicuous location on the device:

This device complies with Part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

- (4) Where a device is constructed in two or more sections connected by wires and marketed together, the statement specified under paragraph (a) of this section is required to be affixed only to the main control unit.
- (5) When the device is so small or for such use that it is not practicable to place the statement specified under paragraph (a) of this section on it, the information required by this paragraph shall be placed in a prominent location in the instruction manual or pamphlet supplied to the user or, alternatively, shall be placed on the container in which the device is marketed. However, the FCC identifier or the unique identifier, as appropriate, must be displayed on the device.

§ 15.21 Information to user.

The users manual or instruction manual for an intentional or unintentional radiator shall caution the user that changes or modifications not expressly approved by the party responsible for compliance could void the user's authority to operate the equipment.

Verification & User's Manual Information

The following is extracted from Title 47 of the Code of Federal Regulations, Part 15, Subpart B — Unintentional Radiators:

§ 15.105 Information to the user.

- (a) For a Class A digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

Note: This equipment has been tested and found to comply with the limits for a Class A digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a commercial environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. Operation of this equipment in a residential area is likely to cause harmful interference in which case the user will be required to correct the interference at own expense.

- (b) For a Class B digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:

Note: This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference when the equipment is operated in a residential environment. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instruction manual, may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:

- Reorient or relocate the receiving antenna.
- Increase the separation between the equipment and receiver.
- Connect the equipment into an outlet on a circuit different from that to which the receiver is connected.
- Consult the dealer or an experienced radio/TV technician for help.

ICES-003 Procedural & Labeling Requirements

From the Industry Canada Electromagnetic Compatibility Advisory Bulletin entitled, "Implementation and Interpretation of the Interference-Causing Equipment Standard for Digital Apparatus, ICES-003" (EMCAB-3, Issue 2, July 1995):

"At present, CISPR 22: 2002 and ICES technical requirements are essentially equivalent. Therefore, if you have CISPR 22: 2002 approval by meeting CISPR Publication 22, the only additional requirements are: to attach a note to the report of the test results for compliance, indicating that these results are deemed satisfactory evidence of compliance with ICES-003 of the Canadian Interference-Causing Equipment Regulations; to maintain these records on file for the requisite five year period; and to provide the device with a notice of compliance in accordance with ICES-003."

Procedural Requirements:

According to Industry Canada's Interference Causing Equipment Standard for Digital Apparatus ICES-003 Issue 4, February 2004:

- Section 6.1: A record of the measurements and results, showing the date that the measurements were completed, shall be retained by the manufacturer or importer for a period of at least five years from the date shown in the record and made available for examination on the request of the Minister.
- Section 6.2: A written notice indicating compliance must accompany each unit of digital apparatus to the end user. The notice shall be in the form of a label that is affixed to the apparatus. Where because of insufficient space or other constraints it is not feasible to affix a label to the apparatus, the notice may be in the form of a statement in the user's manual.

Labeling Requirements:

The suggested text for the notice, in English and in French, is provided below, from the Annex of ICES-003:

This Class [²] digital apparatus complies with Canadian ICES-003.

Cet appareil numérique de la classe [¹] est conforme à la norme NMB-003 du Canada.

² Insert either A or B but not both as appropriate for the equipment requirements.



End of Report