



TEST REPORT

Report Number: 100181239MIN-001R

Project Number: G100181239

Testing performed on the
Model 20023

FCC ID: Y8G-WTL20023

Industry Canada ID: 9505A-WTL20023

to

47 CFR Part 15. 249:2009

RSS- 210, Issue 7, 2007

RSS- 310, Issue 2, 2007

47 CFR Part 15.109:2009 / RSS-GEN:2007

For

Wireless Tow Lights, Inc.

Test Performed by:
Intertek Testing Services NA, Inc.
7250 Hudson Blvd., Suite 100
Oakdale, MN 55128 USA

Test Authorized by:
Wireless Tow Lights, Inc.
29000-2 Aura Road
Solon, OH 44139, USA

Prepared by: Richard Blonigen
Richard Blonigen

Date: December 22, 2010

Reviewed by: Norman Shpilsher
Norman Shpilsher

Date: December 22, 2010

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1.0 GENERAL DESCRIPTION

Model:	Model 20023, Wireless Tow Lights, which consists of Truck transceiver; Tow Lights Transceiver
Type of EUT:	Wireless Tow Lights
FCC ID:	Y8G-WTL20023
Industry Canada ID:	9505A-WTL20023
Related Submittal(s) Grants:	None
Company:	Wireless Tow Lights, Inc.
Customer:	Mr. Joe Tarver
Address:	29000-2 Aurora Road Solon, OH 44139, USA
Phone:	(440) 498-0001
Test Standards:	<input checked="" type="checkbox"/> 47 CFR, Part 15:2009, §15.249 <input checked="" type="checkbox"/> RSS-210, Issue 7, 2007 <input checked="" type="checkbox"/> RSS-310, Issue 2, 2007 <input checked="" type="checkbox"/> RSS-Gen, Issue 2, 2007 <input checked="" type="checkbox"/> 47 CFR, Part 15:2009, §15.109, Class B <input type="checkbox"/> Other
Type of radio:	<input checked="" type="checkbox"/> Stand -alone <input type="checkbox"/> Module <input type="checkbox"/> Hybrid
Date Sample Submitted:	September 15, 2010
Test Work Started:	September 20, 2010
Test Work Completed:	December 22, 2010
Test Sample Conditions:	<input type="checkbox"/> Damaged <input type="checkbox"/> Poor (Usable) <input checked="" type="checkbox"/> Good



1.1 Product Description; Test Facility

Product Description:	Wireless Tow Light
Operating Frequency	2400-2483.5 MHz
Modulation:	Frequency Modulation
Emission Designator:	7K88F1D
Antenna(s) Info:	Integral
Antenna Installation:	<input type="checkbox"/> User <input type="checkbox"/> Professional <input checked="" type="checkbox"/> Factory
Transmitter Power Configuration:	<input type="checkbox"/> Internal battery <input checked="" type="checkbox"/> External power source <input type="checkbox"/> 120VAC <input type="checkbox"/> 230VAC <input type="checkbox"/> 400VAC <input checked="" type="checkbox"/> 12 VDC (Truck DC lines) <div></div> Amp. <input type="checkbox"/> 50Hz <input type="checkbox"/> 60Hz
Special Test Arrangement:	
Test Facility Accreditation:	A2LA (Certificate No. 1427.01)
Test Methodology:	Measurements performed according to the procedures in ANSI C63.10-2009

1.2 EUT Configuration

The equipment under test was operated during the measurement under the following conditions:

- ☐ - Standby
- ☒ - Continuous
- ☐ - Continuous un-modulated
- ☐ - Test program (customer specific)
- ☐ -

Operating modes of the EUT:

No.	Description
1	EUT was pre-programmed and tested at lower, middle, and upper channel transmitting continuously; the EUT with normal operation was used for average correction factor measurements and calculations with one channel being transmitted at a given time; receiving / standby mode was used for receiver and unintentional radiation measurements
2	

Cables:

No.	Type	Length	Designation	Note
1	4-wire unshielded	2m	12VDC Power	
2				

Support equipment/Services:

No.	Item	Description
1	None	
2		

General Notes: Truck Transceiver and Tow Lights Transceiver utilize the identical RF portions and antennas, therefore, the Track Transceiver was tested only for FCC / IC certification

1.3 Environmental conditions

During the measurement the environmental conditions were within the listed ranges:

☐ Normal

Temperature: 15-35 ° C

Humidity: 30-60 %

Atmospheric pressure: 86-106 kPa

1.4 Measurement uncertainty

The expanded uncertainty ($k = 2$) for radiated emissions from 30 to 1000 MHz has been determined to be: ± 4 dB at 10m and ± 5.4 dB at 3m

The expanded uncertainty ($k = 2$) for conducted emissions from 150 kHz to 30 MHz has been determined to be:
 ± 2.6 dB

1.5 Field Strength Calculation

The field strength is calculated by adding the Antenna Factor and Cable Factor, and subtracting the Amplifier Gain (if any) from the measured emissions reading on the EMI Receiver.

The basic equation with a sample calculation is as follows:

$$FS = RA + AF + CF - AG$$

Where: FS = Field Strength in dB(μ V/m)

RA = Receiver Amplitude in dB(μ V)

CF = Cable Attenuation Factor in dB

AF = Antenna Factor in dB(m^{-1})

AG = Amplifier Gain in dB

Assume a receiver reading of 48.1 dB(μ V) is obtained. The antenna factor of 7.4 dB(m^{-1}) and cable factor of 1.6 dB is added and amplifier gain of 16.0 dB is subtracted giving field strength of 41.1 dB(μ V/m).

$$RA = 48.1 \text{ dB}(\mu\text{V})$$

$$AF = 7.4 \text{ dB}(m^{-1})$$

$$CF = 1.6 \text{ dB}$$

$$AG = 16.0 \text{ dB}$$

$$FS = RA + AF + CF - AG$$

$$FS = 48.1 + 7.4 + 1.6 - 16.0$$

$$FS = 41.1 \text{ dB}(\mu\text{V}/\text{m})$$

General notes:

2.0 TEST SUMMARY

Referring to the performance criteria and the operating mode during the tests specified in this report, the equipment complies with the requirements according to the following standards.

TEST SPECIFICATION	TEST PARAMETERS	RESULT
15.249(a) / RSS-210 A2.9(a)	Field strength of fundamental	Pass
15.249(a) / RSS-210 A2.9(a)	Field strength of harmonics	Pass
15.249(d) / RSS-210 A2.9(b)	Field strength of spurious emissions	Pass
15.215(c) / RSS- Gen 4.6.1	Bandwidth of the emission	Pass
15.207/RSS-Gen 7.2.2	Transmitter Power Line conducted emissions	N/A
15.109/ICES-003/ RSS-GEN 7.2.3/RSS-310 3.1	Receiver/digital device radiated emissions	Pass
15.107/ ICES-003	Digital device conducted emissions	N/A



3.0 TEST CONDITIONS AND RESULTS

3.1 Field strength of fundamental

Test location: ☐ OATS ☒ Anechoic Chamber ☐ Other

Test distance: ☐ 10 meters ☒ 3 meters

Test result: **Pass**

Max. Emissions margin at fundamental: 7.6 dB below the limits

Notes: Test performed at low, middle and upper channel



Date:	December 22, 2010	Result: Pass
Standard:	FCC 15.249(a) / RSS-210 A2.9	
Tested by:	Richard Blonigen	
Test Point:	Enclosure with antenna	
Operation mode:	See Page 5	
Note:	None	

Table 3.1.1

Frequency MHz	Antenna		Ant. CF dB1/m	Cable loss dB	Pre-amp Gain (dB)	Peak Reading dBµV	Total @ 3m dBµV/m	Average CF dB	Limit dBµV/m	Margin dB
	Polarity	Hts(cm)								
2433.10	V	178	28.5	3.6	0.0	46.0	78.1	0.0	94.0	-15.9
2433.10	H	196	28.5	3.6	0.0	53.6	85.7	0.0	94.0	-8.3
2443.10	V	133	28.5	3.6	0.0	45.7	77.8	0.0	94.0	-16.2
2443.10	H	210	28.5	3.6	0.0	54.3	86.4	0.0	94.0	-7.6
2453.10	V	178	28.6	3.6	0.0	44.5	76.6	0.0	94.0	-17.4
2453.10	H	174	28.6	3.6	0.0	54.3	86.4	0.0	94.0	-7.6

Comments:



3.2 Field strength of harmonics and spurious emissions

Test location: ☐ OATS ☒ Anechoic Chamber ☐ Other

Test distance: ☐ 10 meters ☒ 3 meters

Frequency range of measurements: 30MHz-25GHz

Test result: **Pass**

Max. margin of harmonics and spurious emissions: 1.2dB below the limits

Notes: No emissions were detected above ambient noise at 4th harmonic and beyond. Test performed at low, middle and upper channel.

Date:	December 20 & 22, 2010	Result: Pass
Standard:	FCC 15.249(a) and (d) / RSS-210 A2.9	
Tested by:	Richard Blonigen	
Test Point:	Enclosure with antenna	
Operation mode:	See Page 5	
Note:	Frequency Range: 30MHz-1GHz, Quasi-peak readings	

Table 3.2.1

Frequency MHz	Antenna		Ant. CF dB1/m	Cable loss dB	Pre-amp Gain (dB)	QP Reading dBμV	Total @ 3m dBμV/m	Limit dBμV/m	Margin dB
	Polarity	Hts(cm)							
Channel 0									
52.00	V	100	8.4	0.7	0.0	21.2	30.3	40.0	-9.7
156.00	V	320	10.9	1.3	0.0	22.3	34.5	43.5	-9.0
225.35	V	100	11.0	1.6	0.0	16.2	28.8	43.5	-14.7
52.00	H	400	8.4	0.7	0.0	14.3	23.4	40.0	-16.6
156.00	H	400	10.9	1.3	0.0	23.5	35.7	43.52	-7.8
225.35	H	400	11.0	1.6	0.0	15.6	28.2	46.0	-17.8
Channel 50									
52.00	V	100	8.4	0.7	0.0	22.5	31.6	40.0	-8.4
156.00	V	316	10.9	1.3	0.0	20.2	32.4	43.5	-11.1
543.88	V	100	19.0	2.7	0.0	13.1	34.8	46.0	-11.2
52.00	H	400	8.4	0.7	0.0	14.8	23.9	40.0	-16.1
156.00	H	400	10.9	1.3	0.0	25.2	37.4	43.5	-6.1
225.35	H	133	11.0	1.6	0.0	16.5	29.1	46.0	-16.9
Channel 100									
52.00	V	100	8.4	0.7	0.0	20.5	29.6	40.0	-10.4
156.00	V	320	10.9	1.3	0.0	22.6	34.8	43.5	-8.7
234.01	V	241	11.7	1.6	0.0	12.5	25.8	46.0	-20.2
52.00	H	400	8.4	0.7	0.0	12.0	21.1	40.0	-18.9
156.00	H	400	10.9	1.3	0.0	24.8	37.0	43.5	-6.5
234.01	H	165	11.7	1.6	0.0	16.8	30.1	46.0	-15.9

Comments:

Date:	December 22, 2010	Result: Pass
Standard:	FCC 15.249(a) and (d) / RSS-210 A2.9	
Tested by:	Richard Blonigen	
Test Point:	Enclosure with antenna	
Operation mode:	See Page 5	
Note:	Frequency Range: 1GHz-25GHz, Peak Readings	

Table 3.2.2

Frequency MHz	Antenna		Ant. CF dB1/m	Cable loss dB	Pre-amp Gain (dB)	Reading dBμV	Total @ 3m dBμV/m	Average C. F. (dB)	Limit dBμV/m	Margin dB
	Polarity	Hts(cm)								
Channel 0										
4866.25	V	136	33.1	4.9	41.8	65.3	61.5	0.0	74.0	-12.4
7299.40	V	143	36.0	6.2	41.2	46.0	47.0	0.0	74.0	-27.0
4866.25	H	172	33.1	4.9	41.8	69.4	65.6	0.0	74.0	-8.3
7299.40	H	132	36.0	6.2	41.2	49.9	50.9	0.0	74.0	-23.1
Channel 50										
4886.25	V	120	33.1	4.9	41.8	63.6	59.9	0.0	74.0	-14.1
7330.00	V	144	36.1	6.2	41.2	44.9	46.0	0.0	74.0	-28.0
4886.25	H	167	33.1	4.9	41.8	68.8	65.1	0.0	74.0	-8.9
7330.00	H	115	36.1	6.2	41.2	46.9	48.0	0.0	74.0	-26.0
Channel 100										
4906.25	V	166	33.1	4.9	41.7	61.5	57.9	0.0	74.0	-16.1
5075.00	V	100	33.4	5.0	41.6	37.3	34.1	0.0	74.0	-39.9
7359.30	V	151	36.1	6.2	41.1	45.3	46.5	0.0	74.0	-27.5
4906.25	H	178	33.1	4.9	41.7	69.1	65.5	0.0	74.0	-8.5
5254.40	H	100	33.7	5.1	41.6	38.2	35.5	0.0	74.0	-38.5
7359.30	H	126	36.1	6.2	41.1	48.9	50.1	0.0	74.0	-23.9

Comments:

Date:	December 22, 2010	Result: Pass
Standard:	FCC 15.249(a) and (d) / RSS-210 A2.9	
Tested by:	Richard Blonigen	
Test Point:	Enclosure with antenna	
Operation mode:	See Page 5	
Note:	Frequency Range: 1GHz-25GHz, Average value readings	

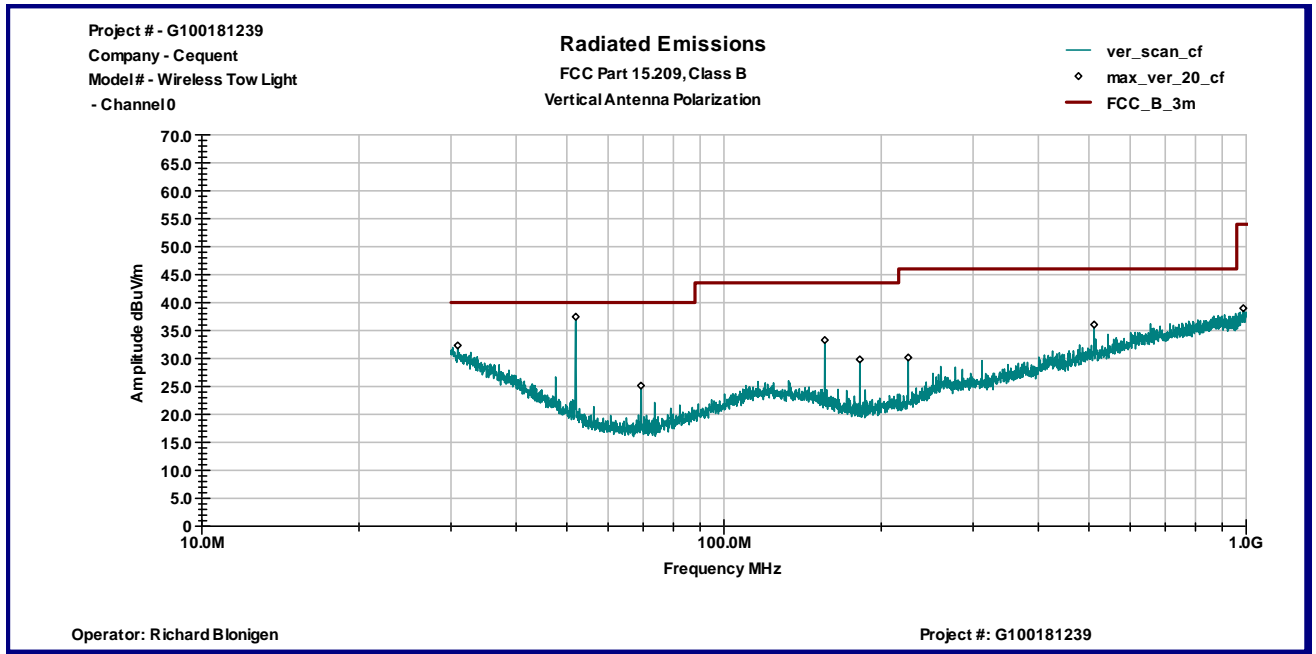
Table 3.2.3

Frequency MHz	Antenna		Ant. CF dB1/m	Cable loss dB	Pre-amp Gain (dB)	Reading dBμV	Total @ 3m dBμV/m	Average C. F. (dB)	Limit dBμV/m	Margin dB
	Polarity	Hts(cm)								
Channel 0										
4866.25	V	136	33.1	4.9	41.8	65.3	61.5	12.9	54.0	-5.3
7299.40	V	143	36.0	6.2	41.2	46.0	47.0	12.9	54.0	-19.9
4866.25	H	172	33.1	4.9	41.8	69.4	65.6	12.9	54.0	-1.2
7299.40	H	132	36.0	6.2	41.2	49.9	50.9	12.9	54.0	-16.0
Channel 50										
4886.25	V	120	33.1	4.9	41.8	63.6	59.9	12.9	54.0	-7.0
7330.00	V	144	36.1	6.2	41.2	44.9	46.0	12.9	54.0	-20.9
4886.25	H	167	33.1	4.9	41.8	68.8	65.1	12.9	54.0	-1.8
7330.00	H	115	36.1	6.2	41.2	46.9	48.0	12.9	54.0	-18.9
Channel 100										
4906.25	V	166	33.1	4.9	41.7	61.5	57.9	12.9	54.0	-9.0
5075.00	V	100	33.4	5.0	41.6	37.3	34.1	12.9	54.0	-32.8
7359.30	V	151	36.1	6.2	41.1	45.3	46.5	12.9	54.0	-20.4
4906.25	H	178	33.1	4.9	41.7	69.1	65.5	12.9	54.0	-1.4
5254.40	H	100	33.7	5.1	41.6	38.2	35.5	12.9	54.0	-31.4
7359.30	H	126	36.1	6.2	41.1	48.9	50.1	12.9	54.0	-16.8

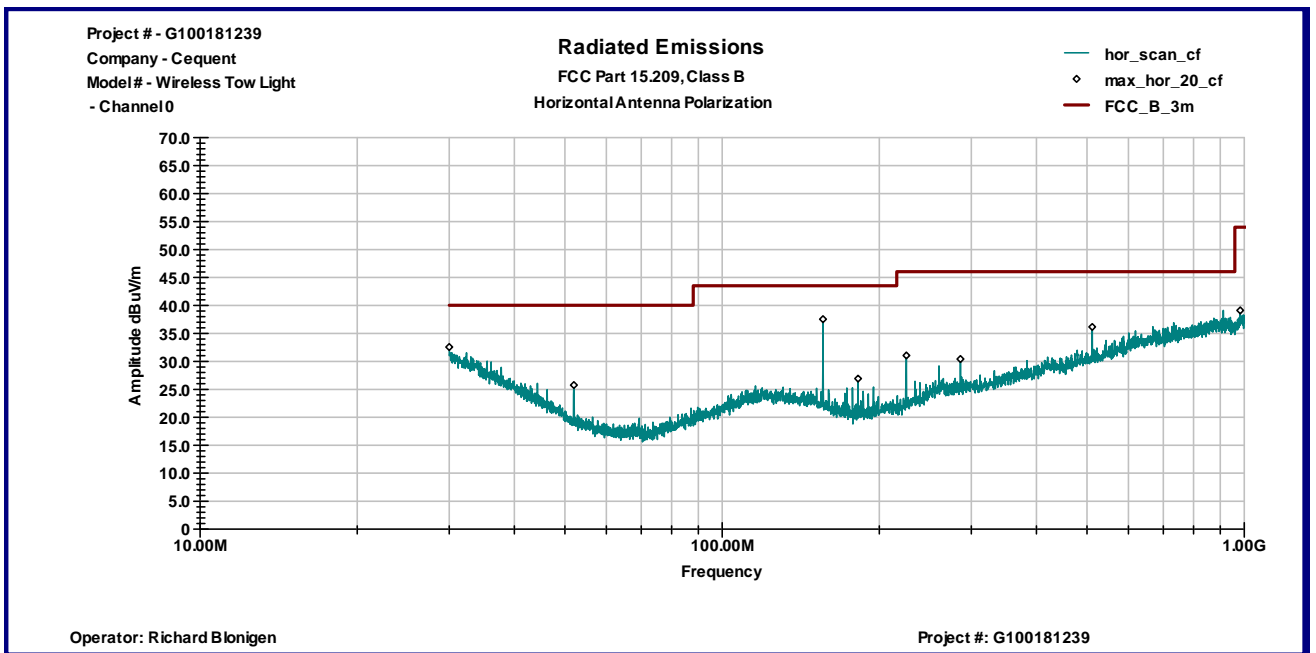
Comments:

Graph 3.2.1

Vertical antenna polarization

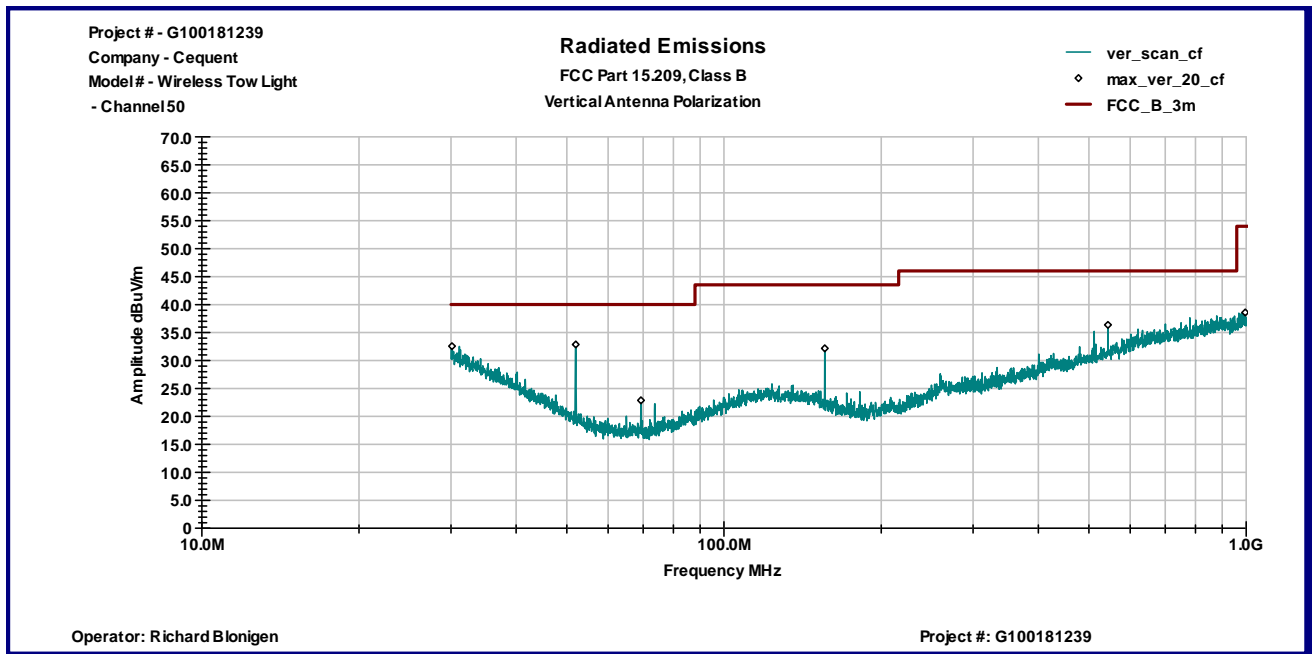


Horizontal antenna polarization

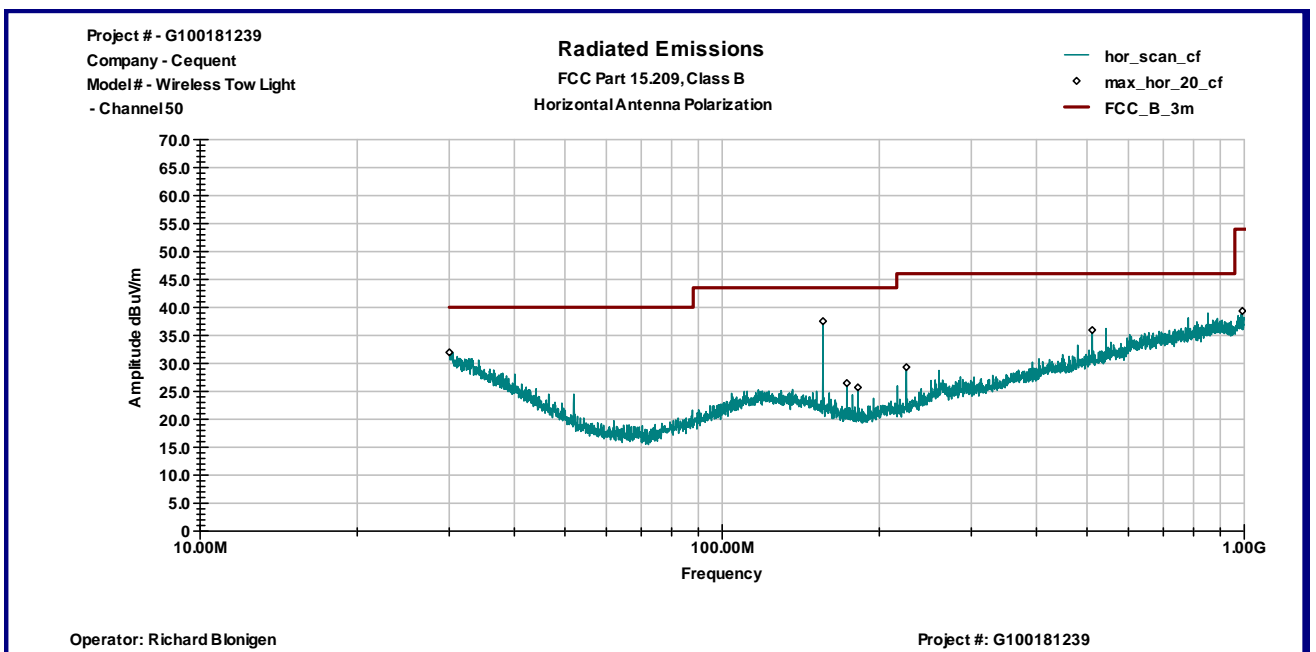


Graph 3.2.2

Vertical antenna polarization

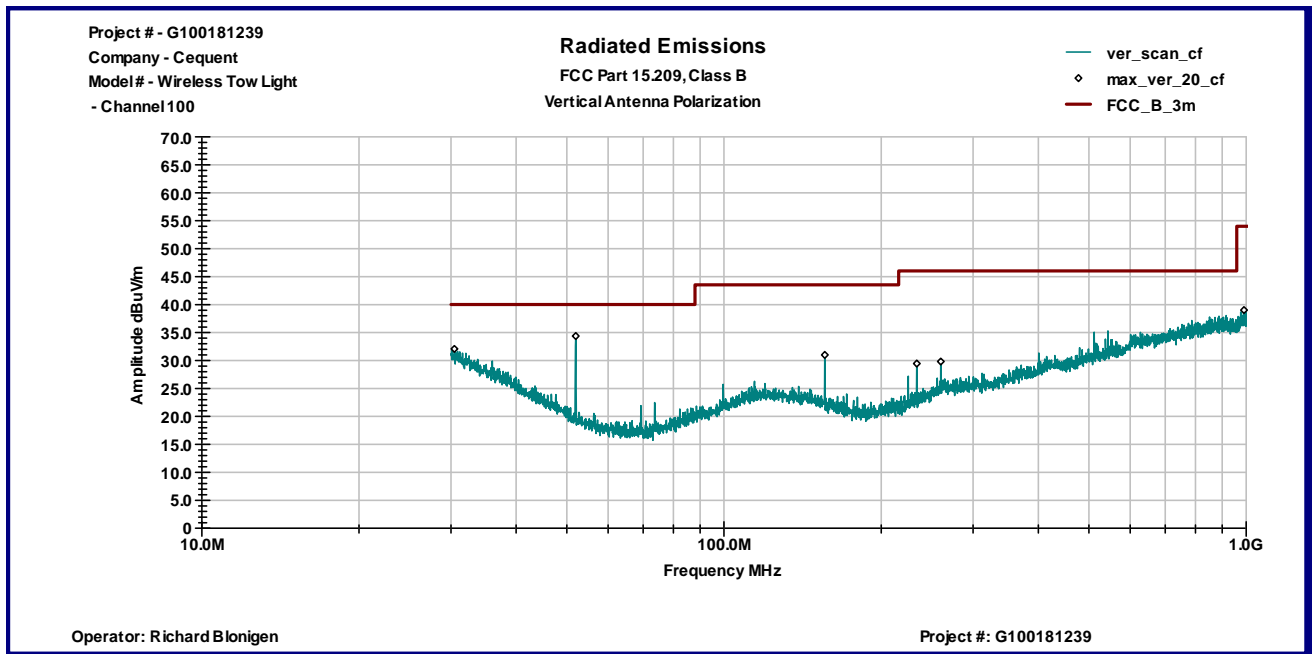


Horizontal antenna polarization

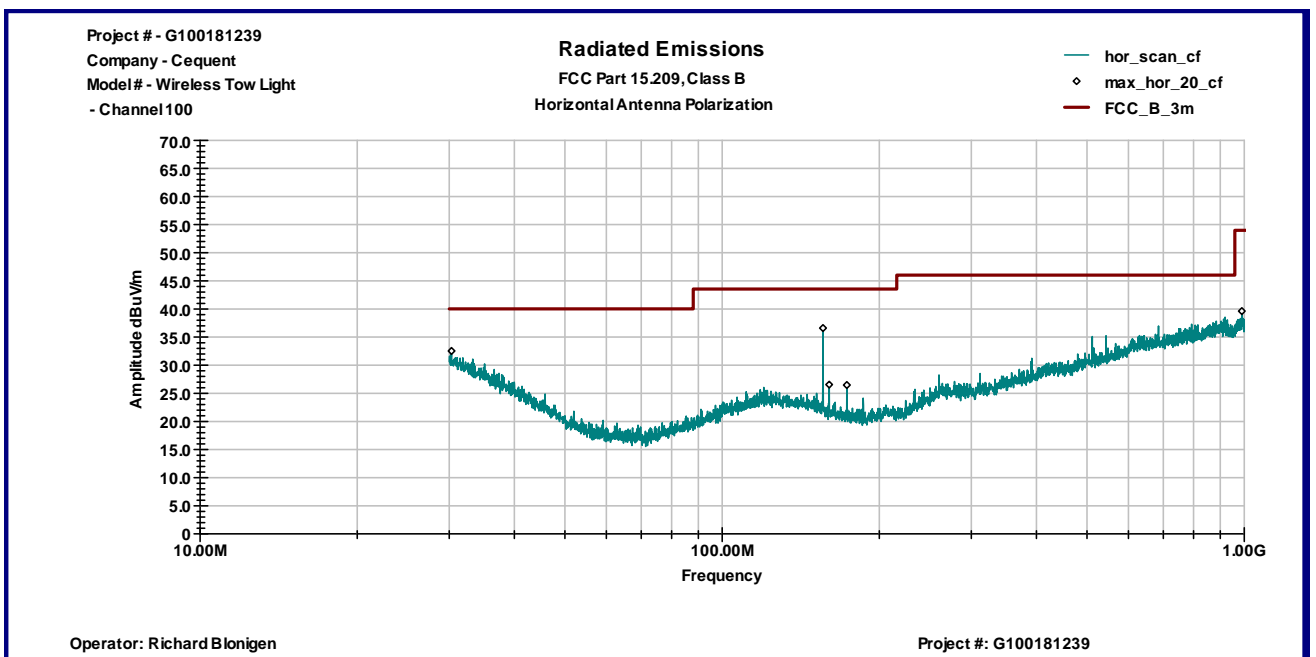


Graph 3.2.3

Vertical antenna polarization

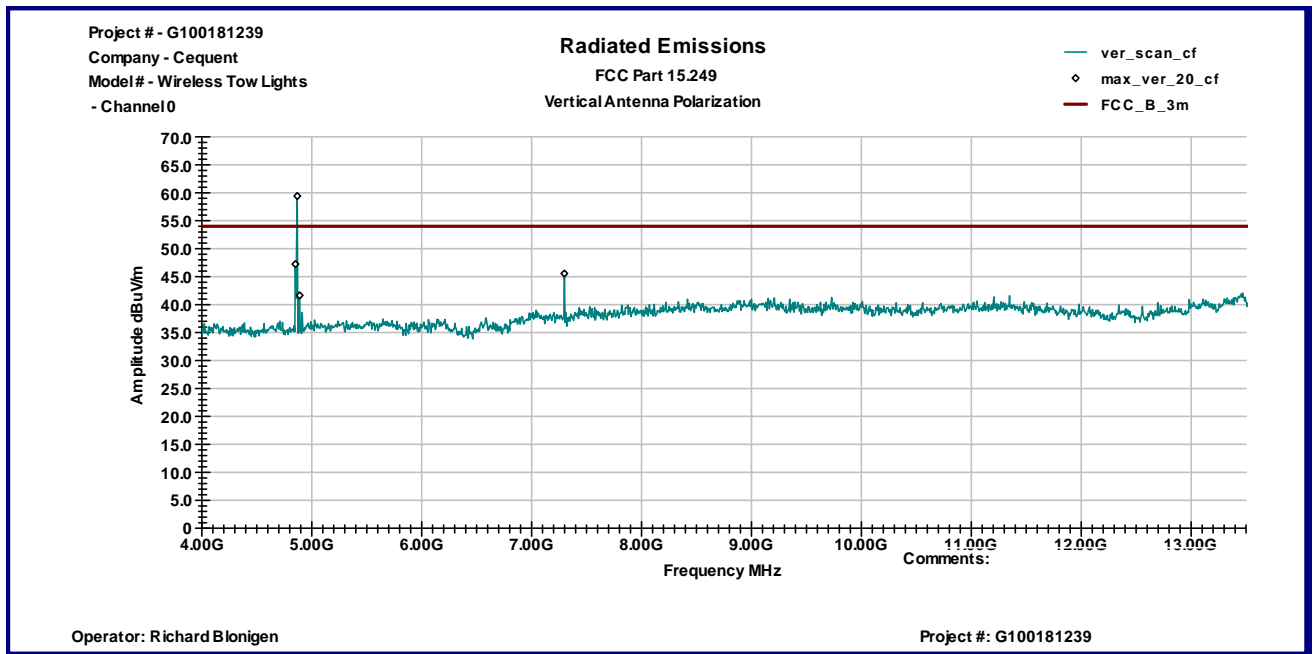


Horizontal antenna polarization

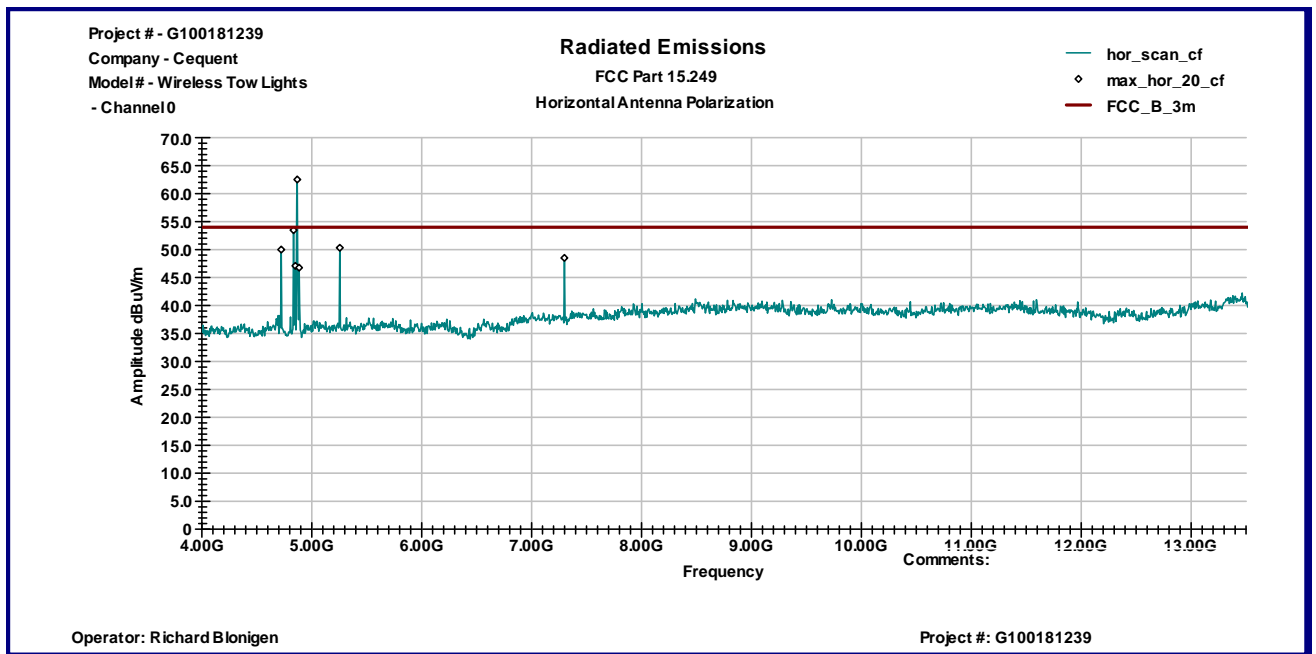


Graph 3.2.4

Vertical antenna polarization

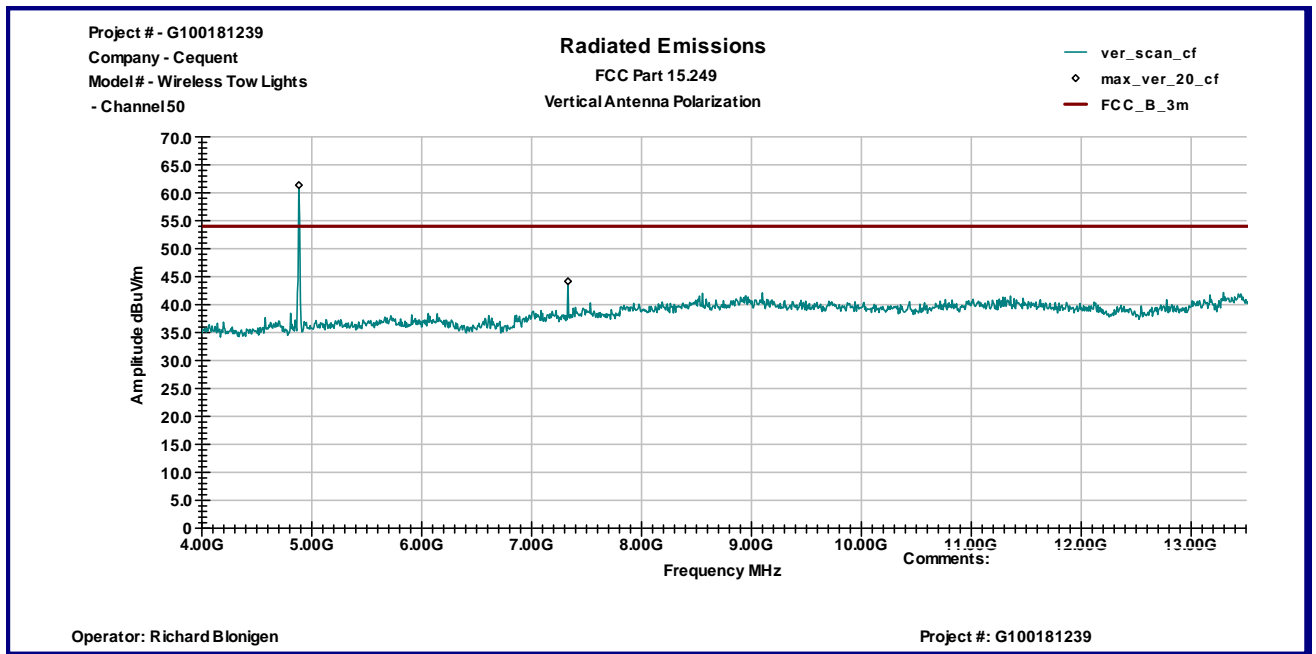


Horizontal antenna polarization

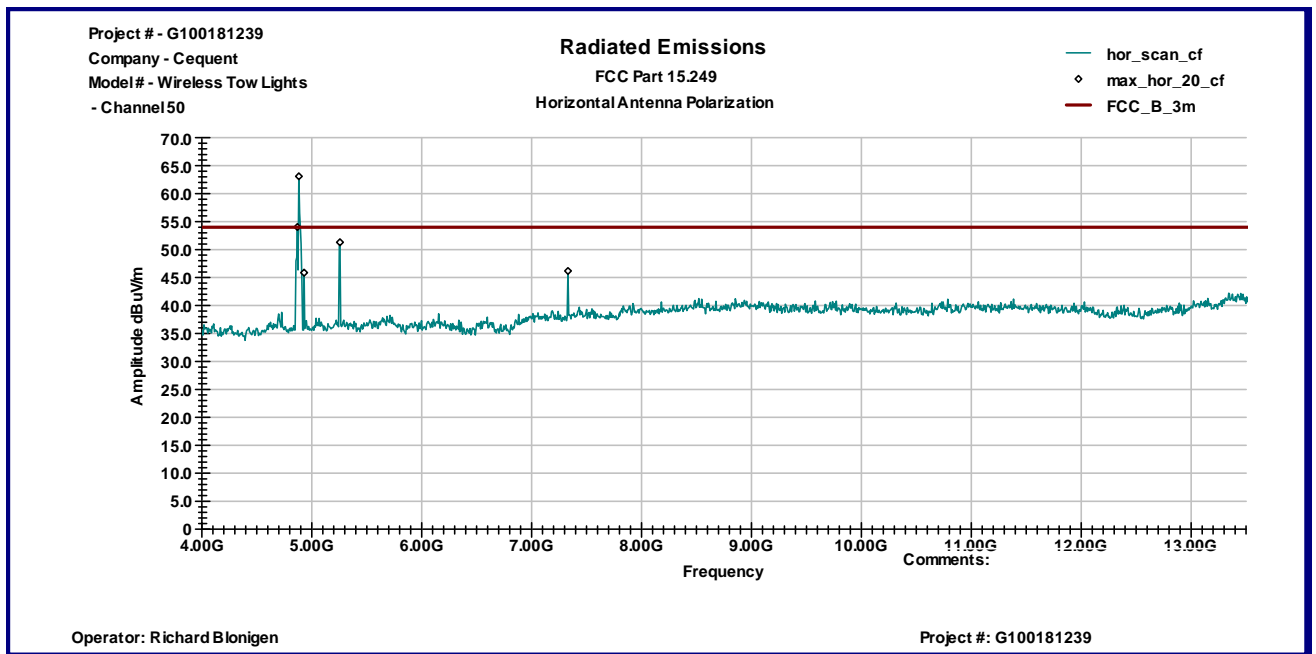


Graph 3.2.5

Vertical antenna polarization

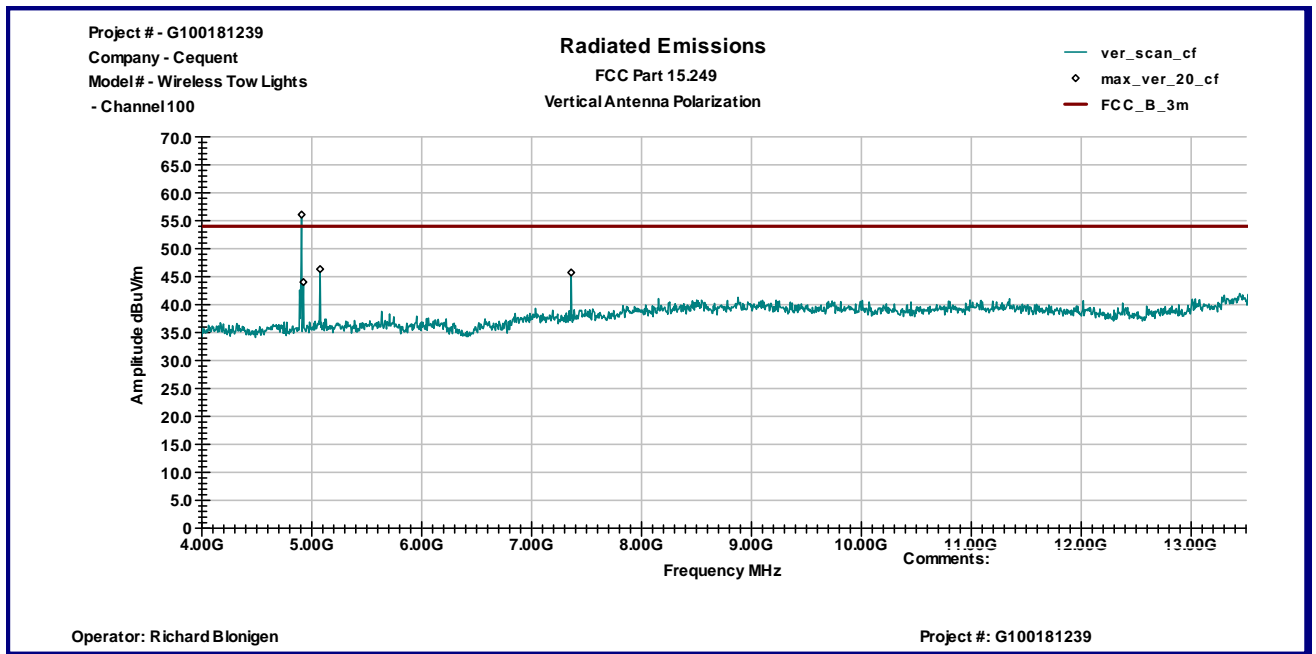


Horizontal antenna polarization

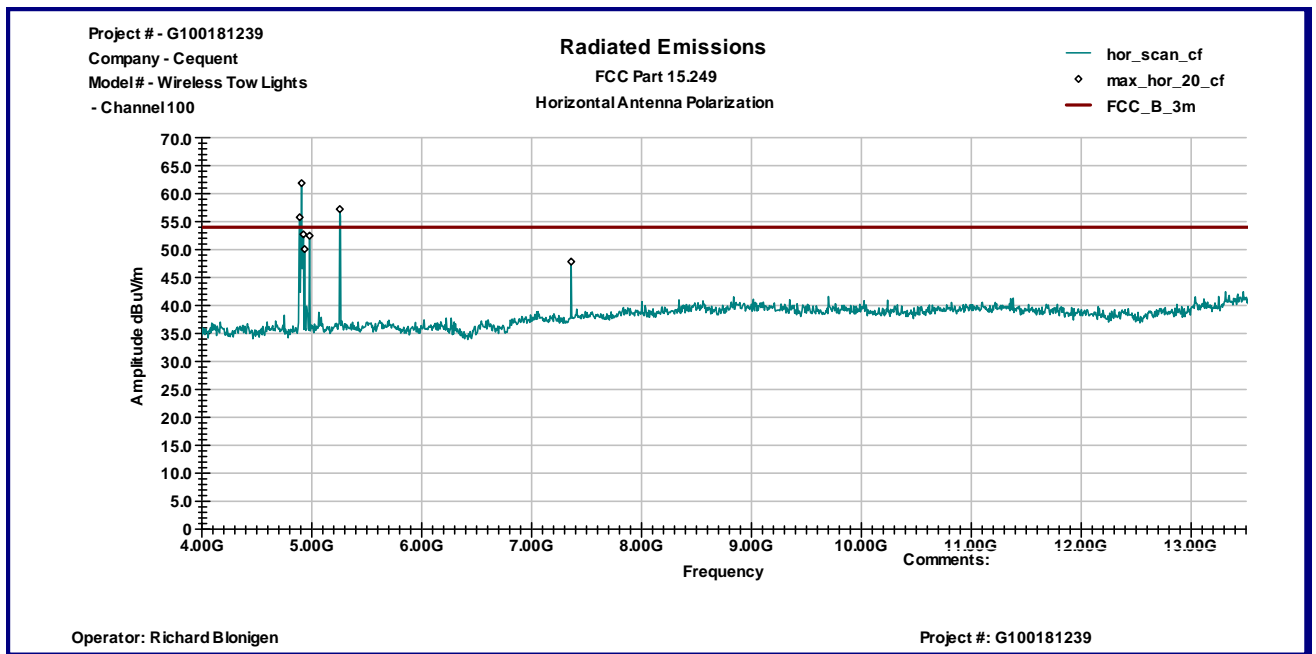


Graph 3.2.6

Vertical antenna polarization

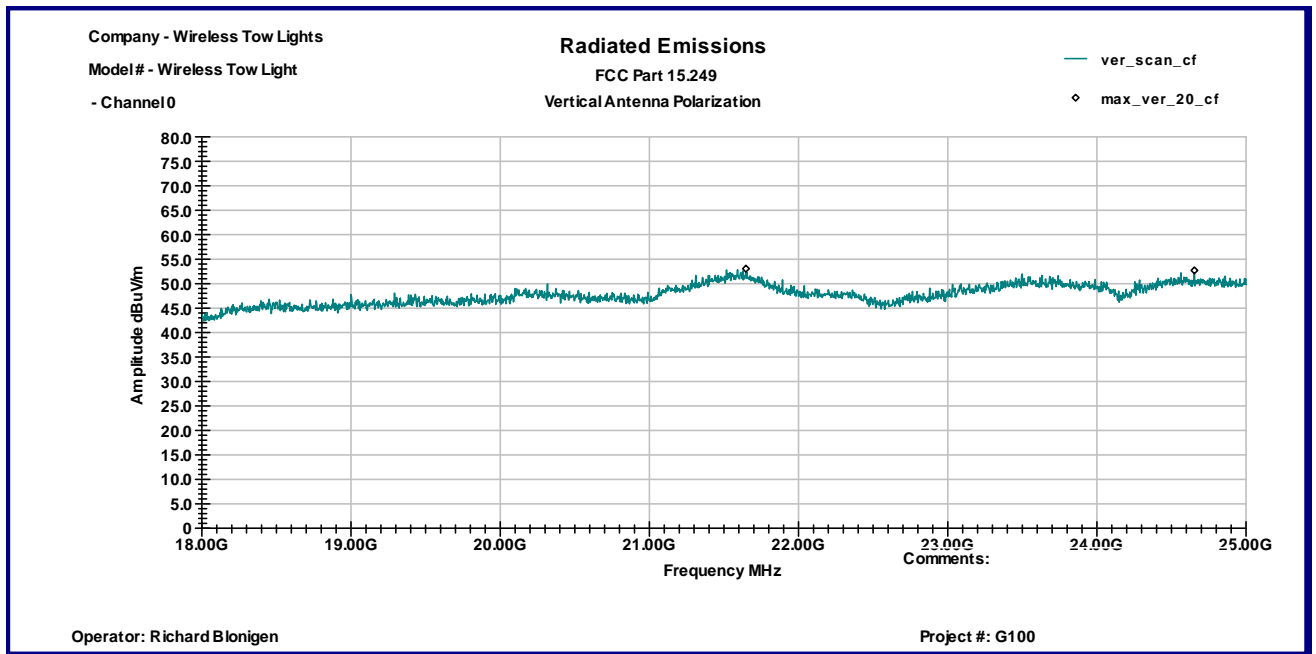


Horizontal antenna polarization

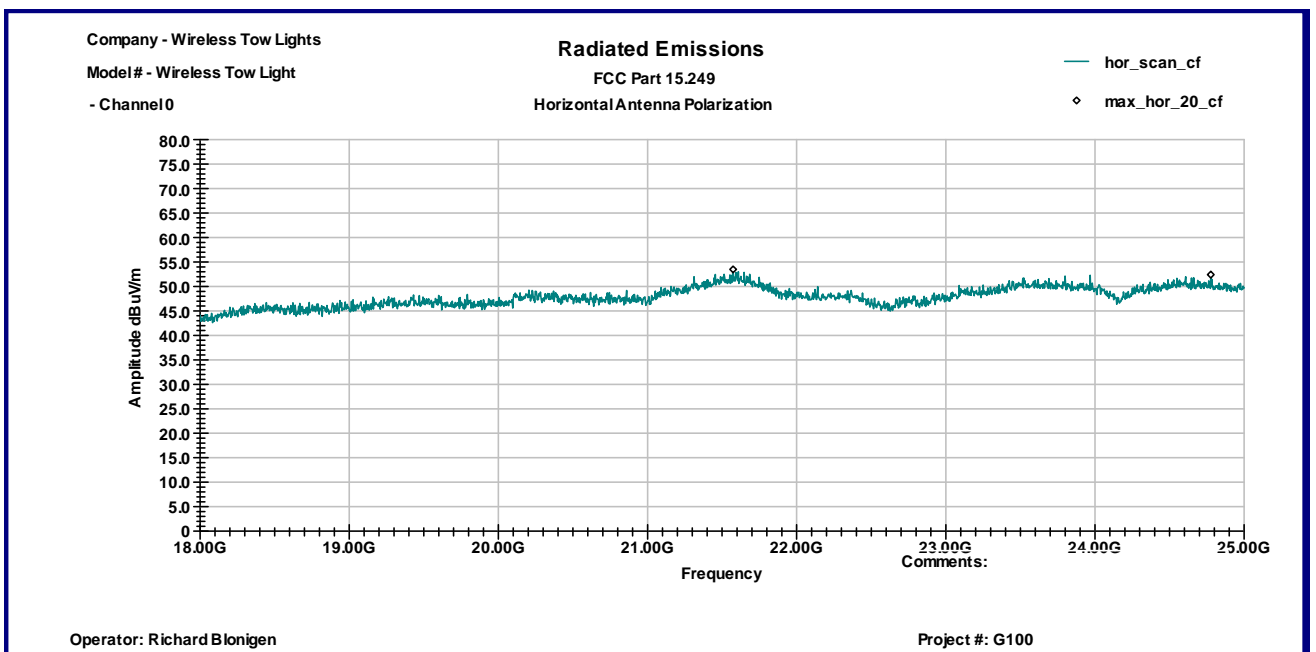


Graph 3.2.7

Vertical antenna polarization

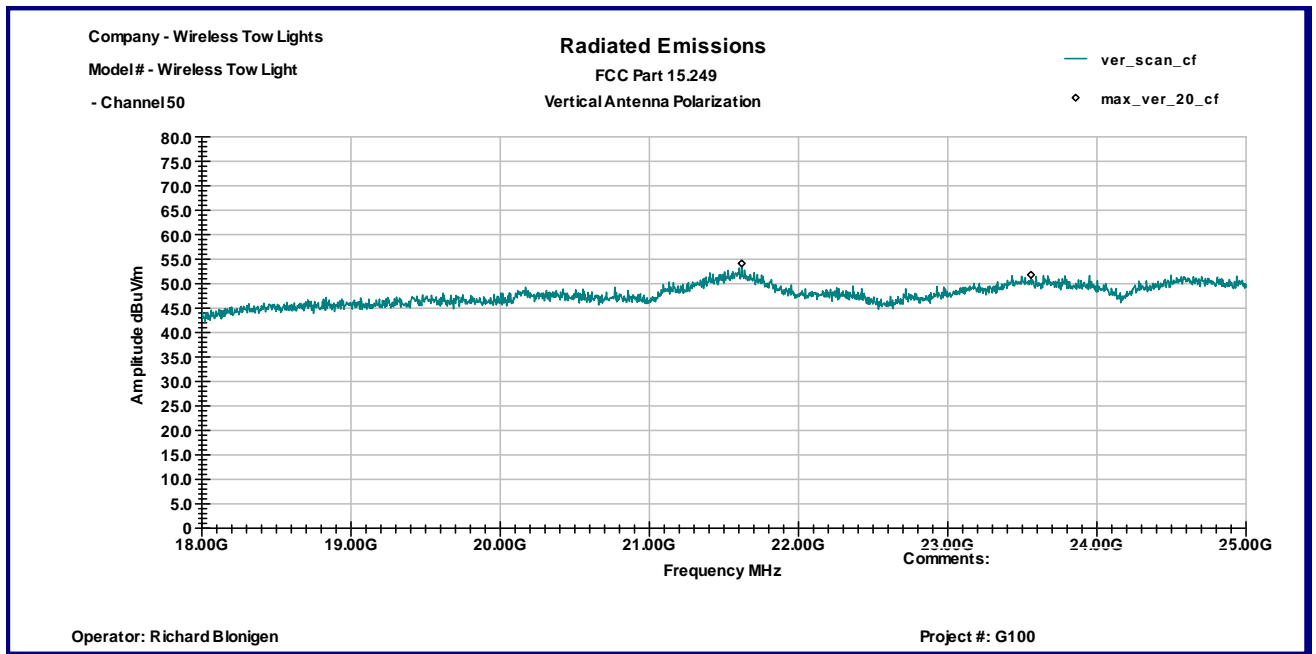


Horizontal antenna polarization

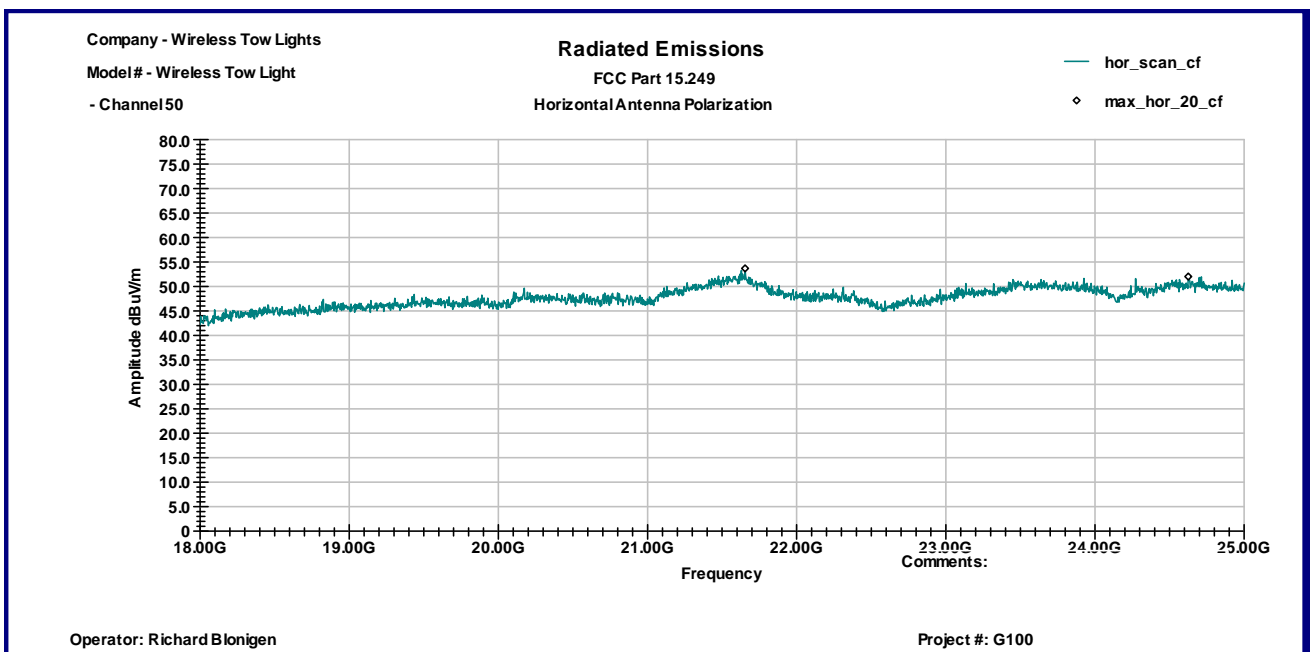


Graph 3.2.8

Vertical antenna polarization

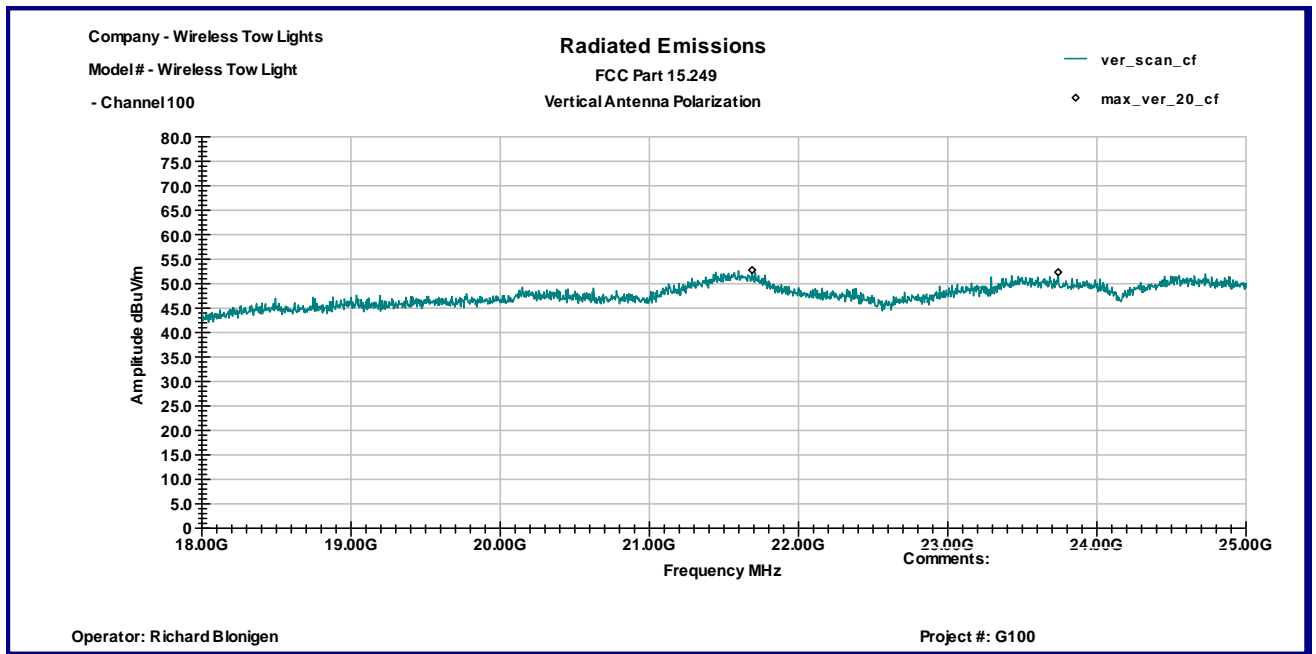


Horizontal antenna polarization

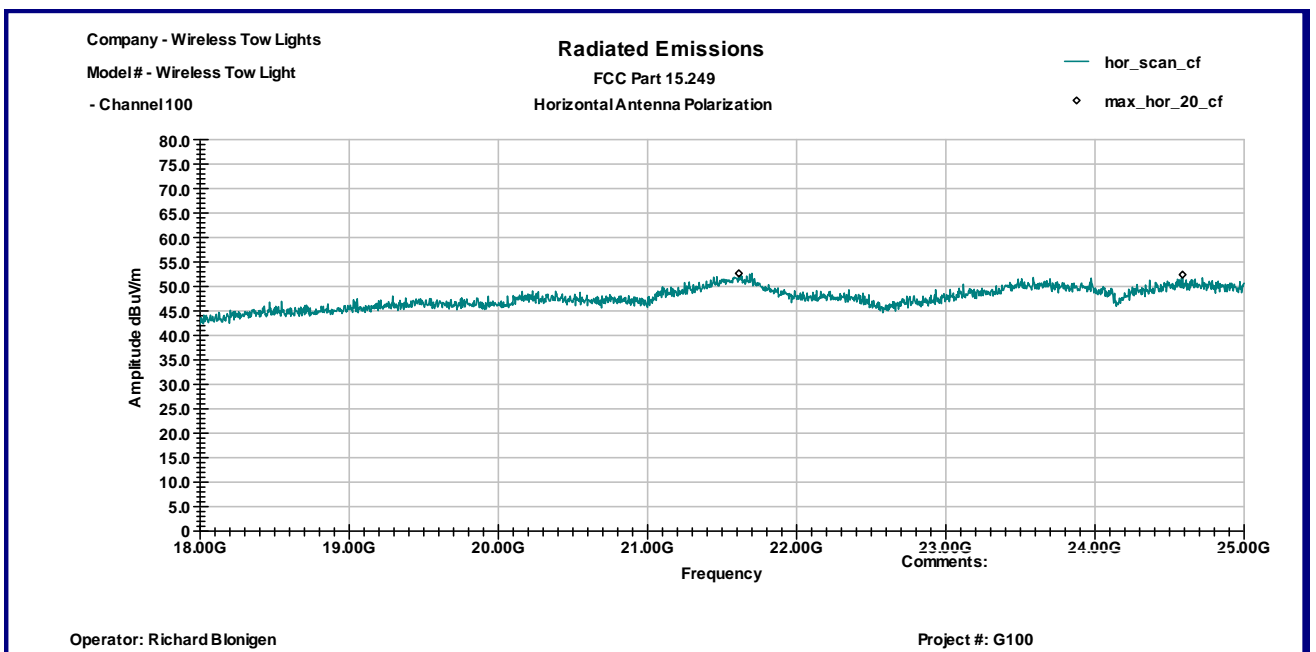


Graph 3.2.9

Vertical antenna polarization



Horizontal antenna polarization





3.2.1 Average correction factor calculation

An Average correction factor is calculated by averaging one complete pulse train.

One complete pulse train, including blanking intervals is more than 100ms therefore 100ms is used to calculate correction factor

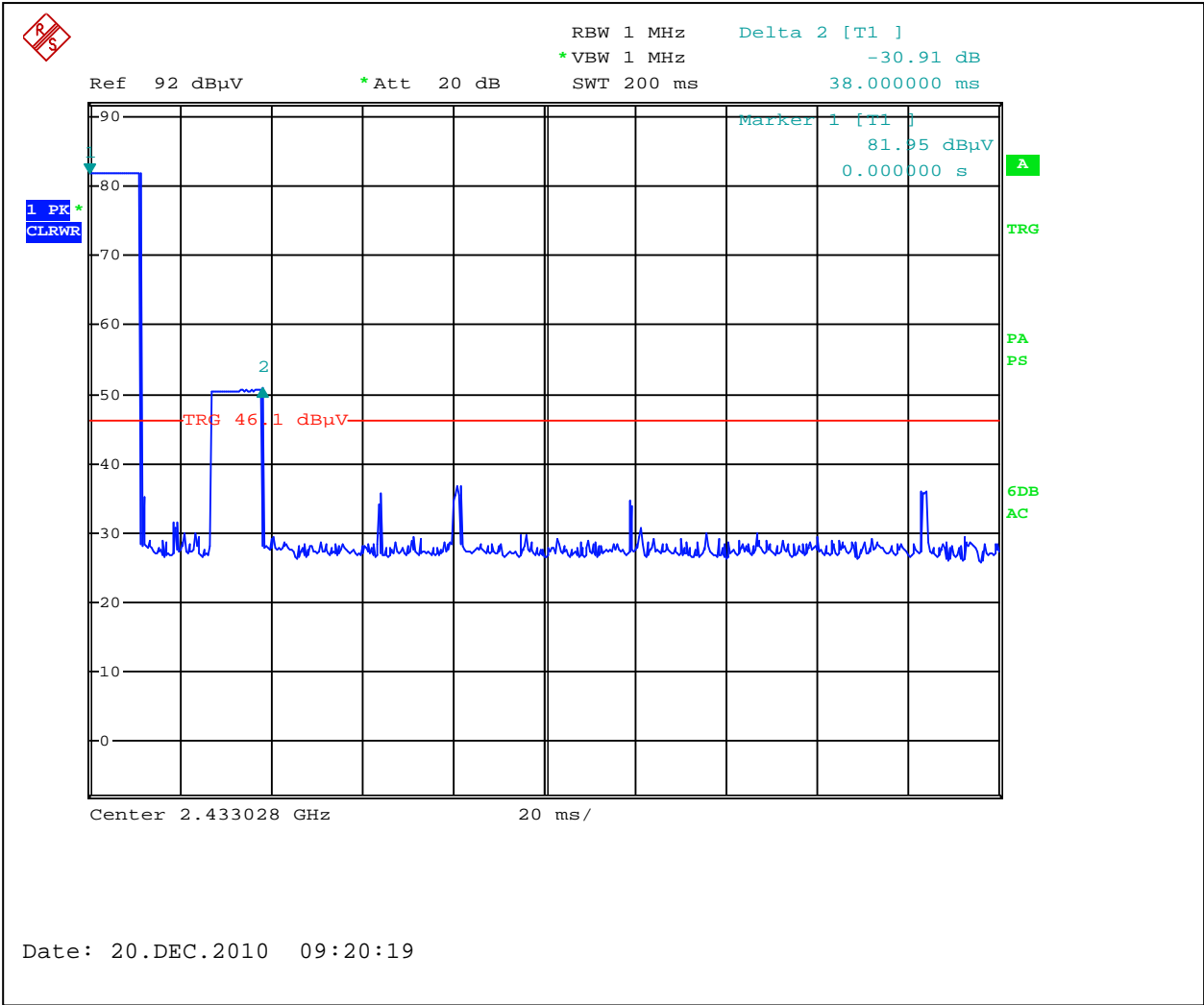
Time with field strength is in its maximum value (length of pulses) =22.7 ms (11.3ms + 11.4ms)

Average Correction Factor = $20\text{Log}(22.7\text{ms}/100\text{ms}) = -12.9\text{dB}$

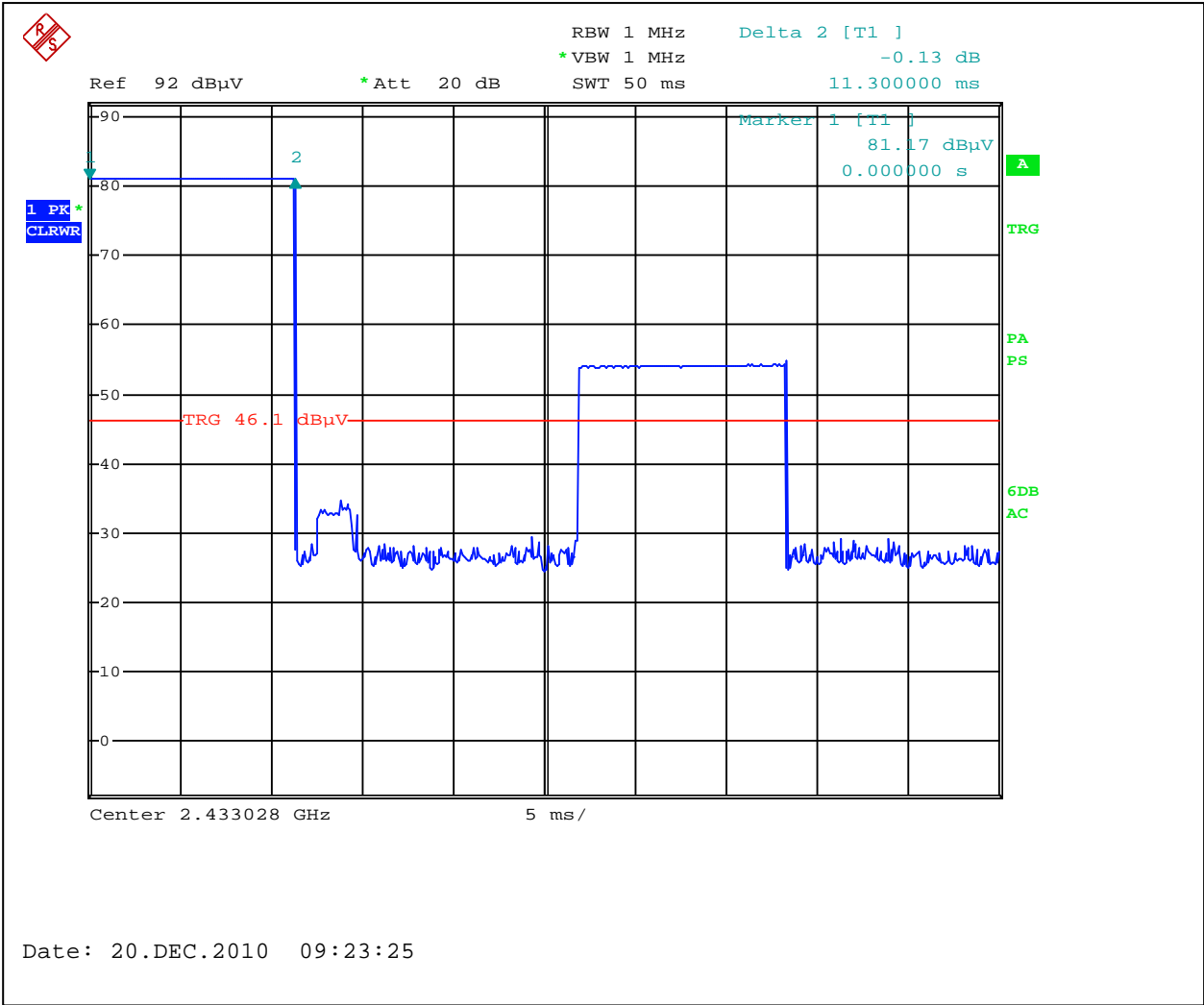
Graphs 3-2-3 to 3-2-5 show pulse train timing.



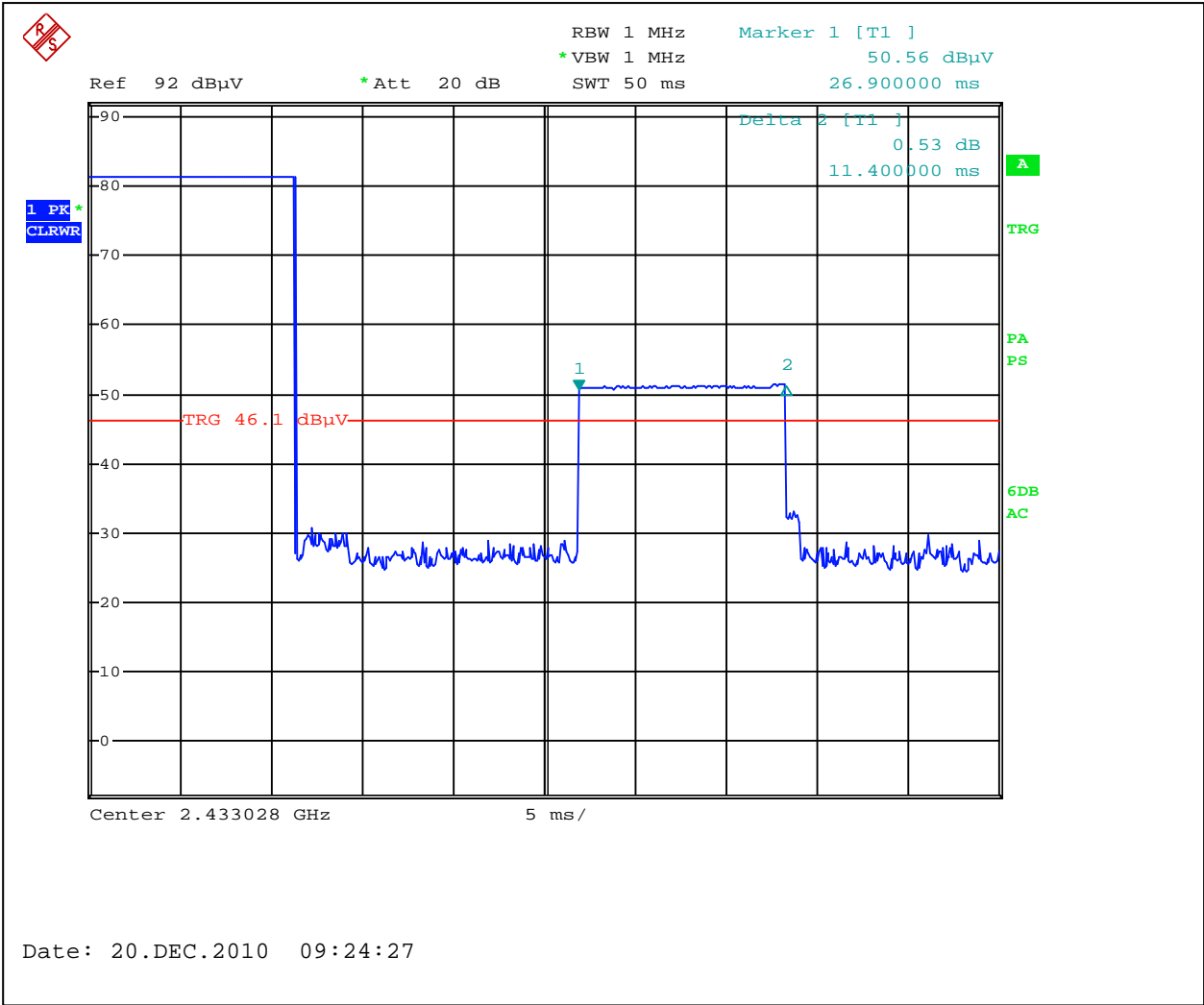
Graph 3.2.3



Graph 3.2.4



Graph 3.2.5



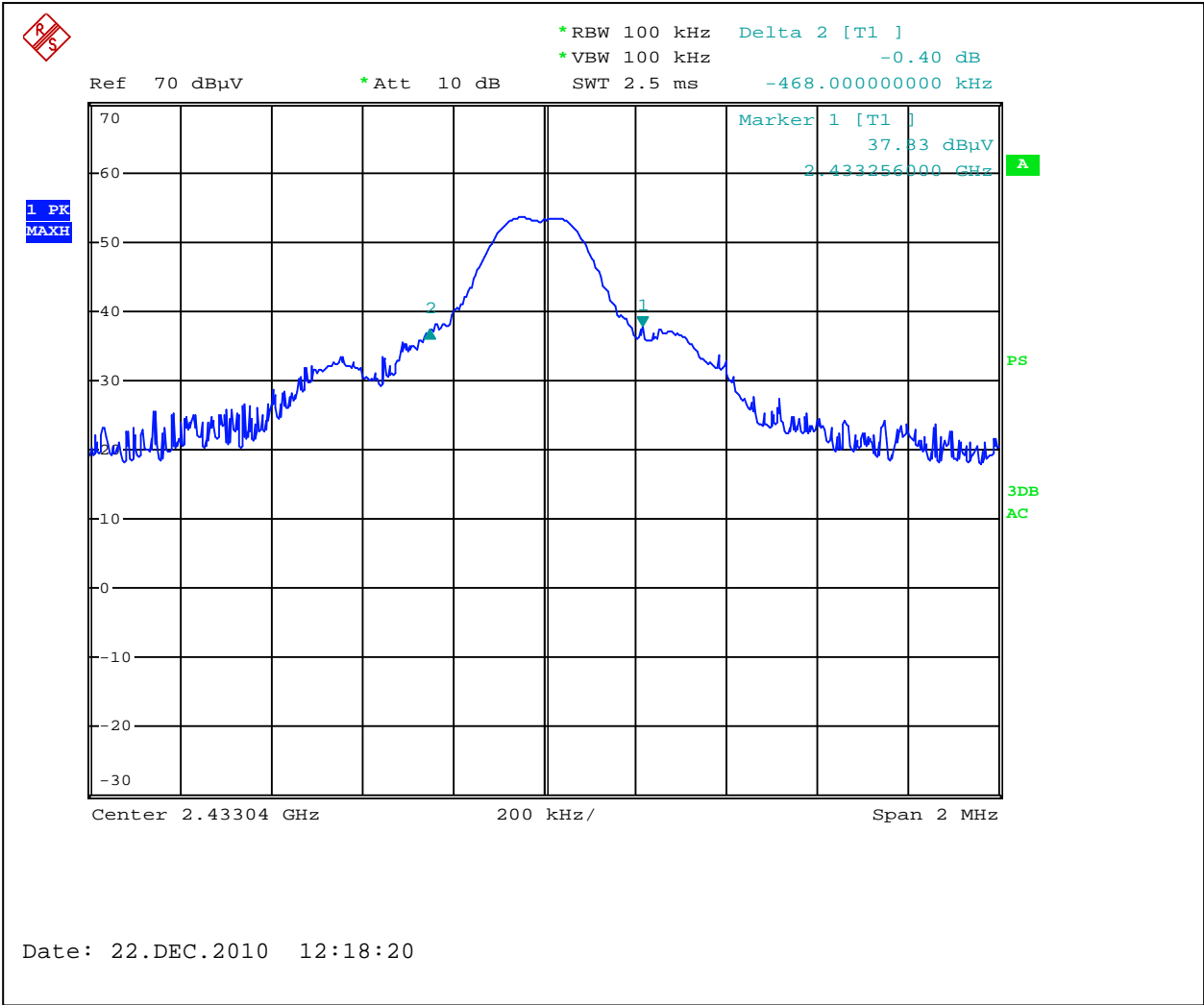
3.3 Bandwidth of Emissions

Center Frequency of operation MHz	Measured 20dB bandwidth kHz	Measured 99% bandwidth kHz
2433.10	468.00	764.00
2443.10	416.00	516.00
2453.10	440.00	788.00

Graphs 3-3-1 through 3-3-6 show bandwidth of emissions

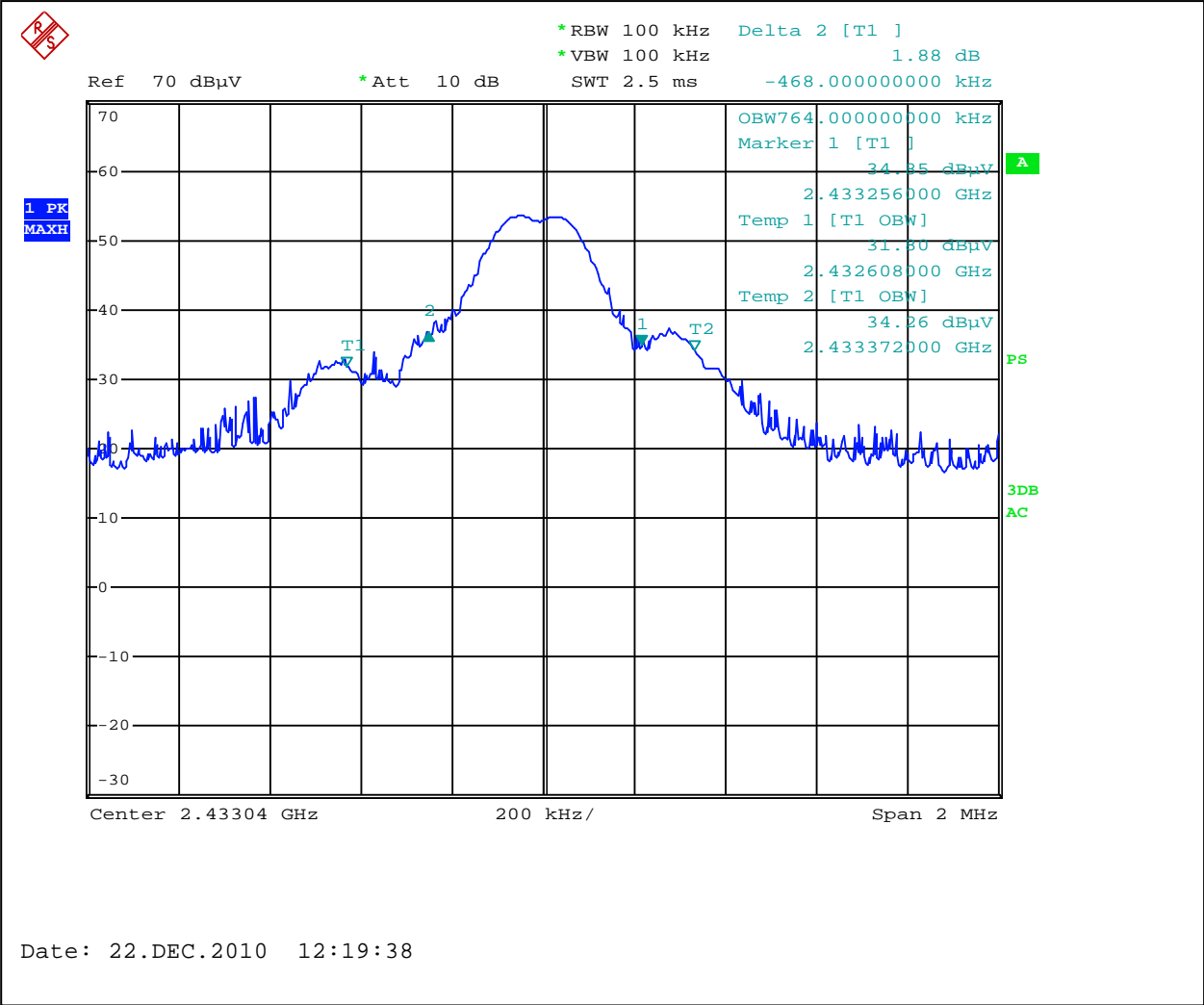
Notes: The bandwidth of emissions is contained within the frequency band of operation

Graph 3.3.1

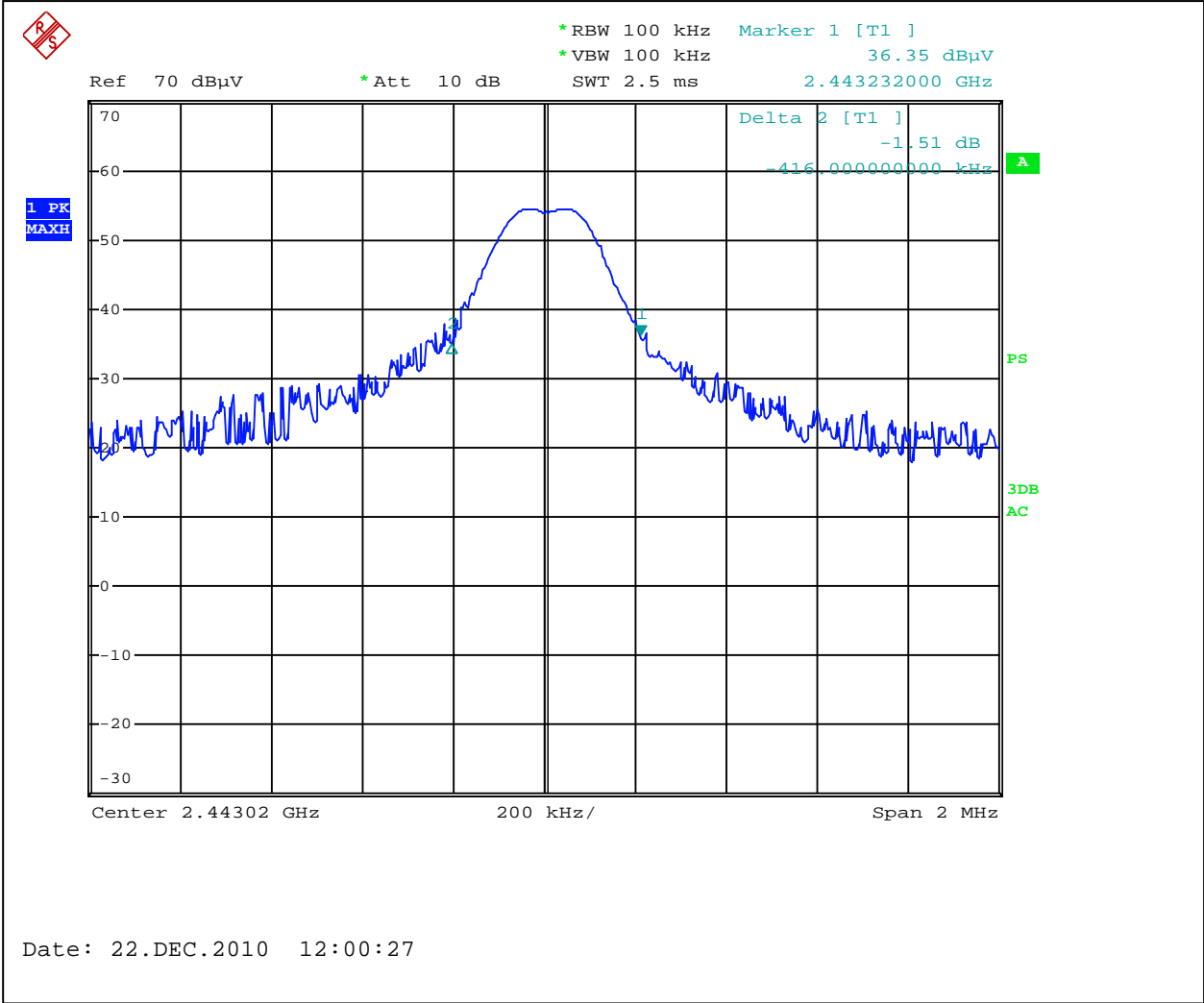




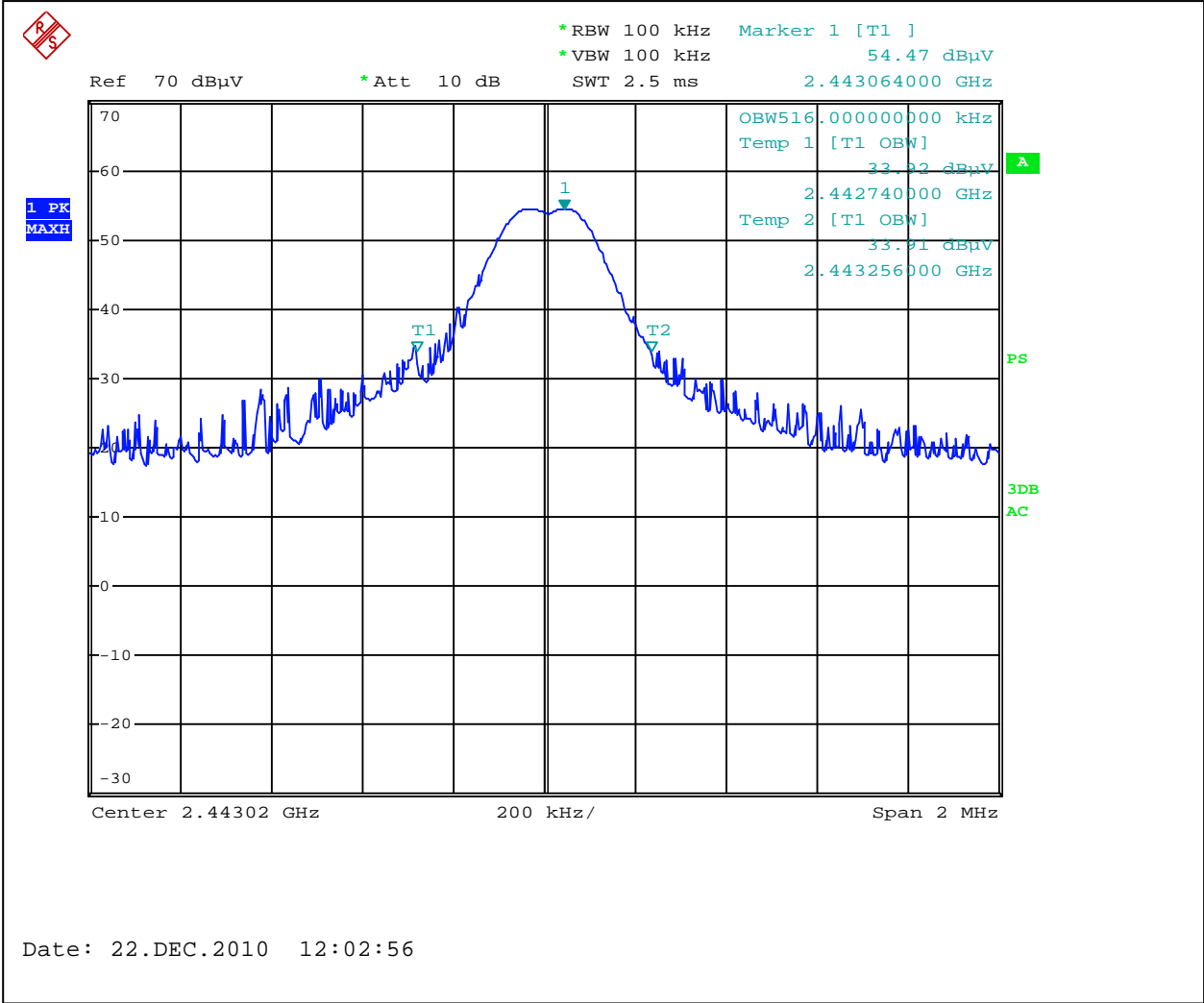
Graph 3.3.2



Graph 3.3.3

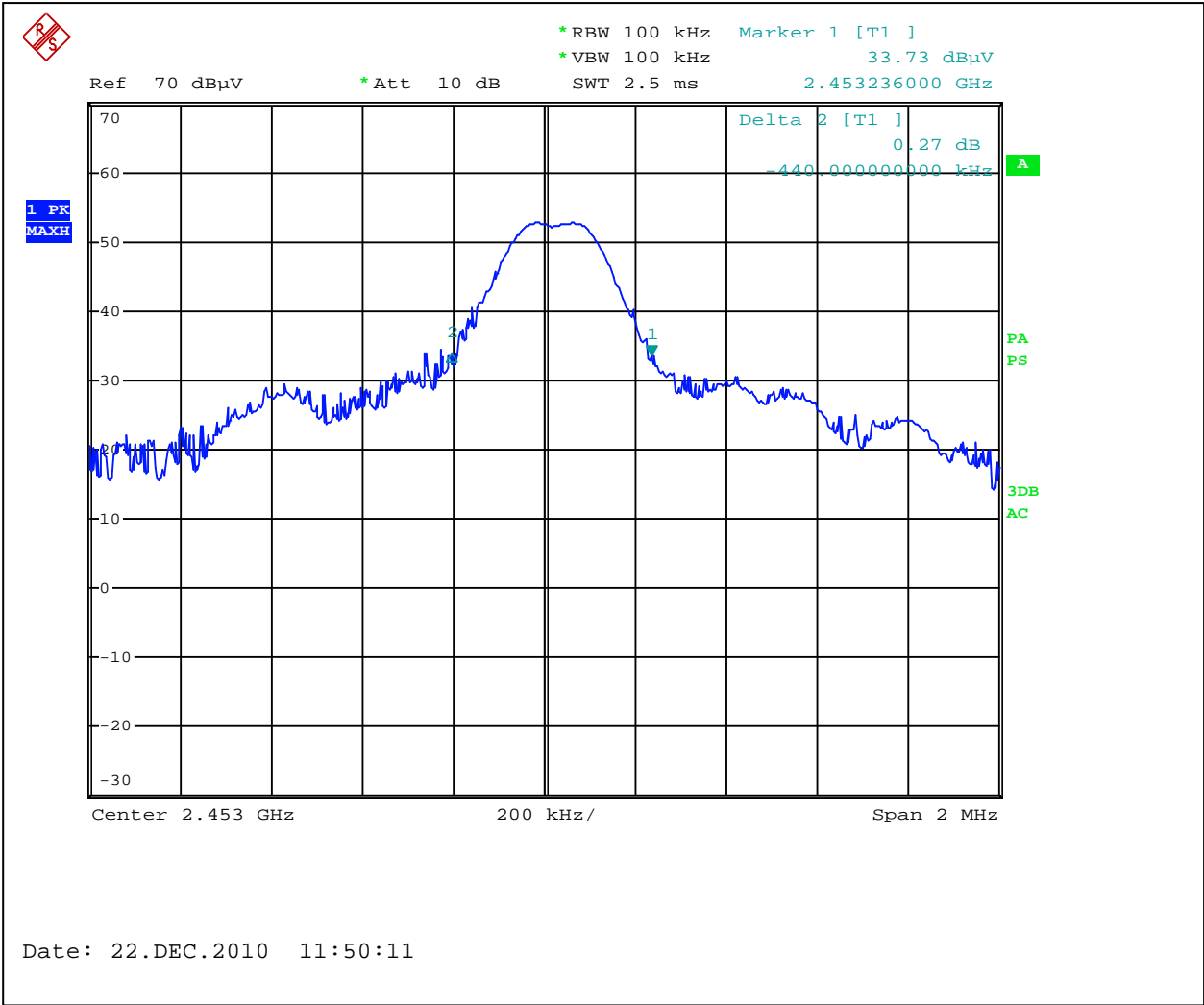


Graph 3.3.4

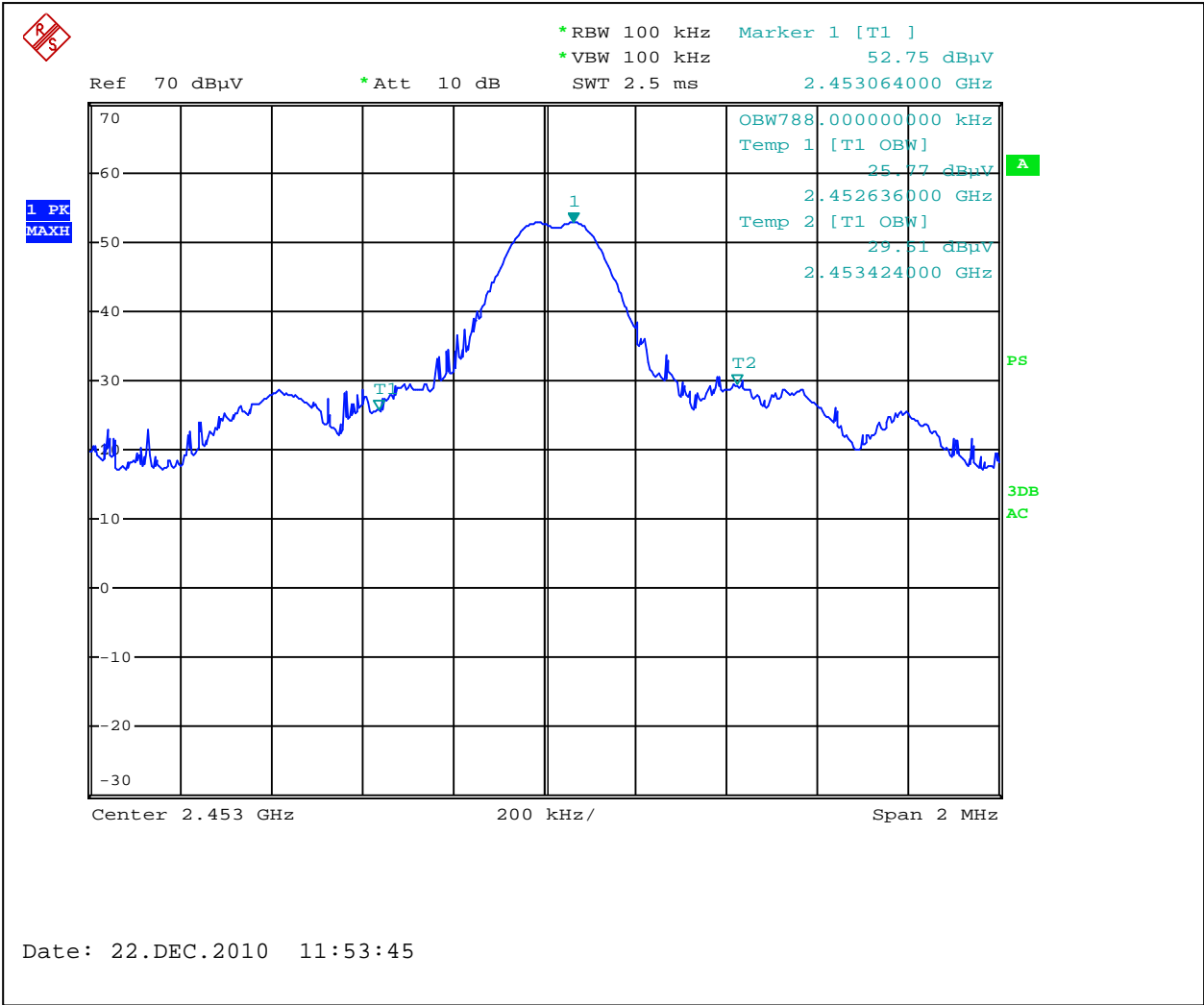




Graph 3.3.5



Graph 3.3.6





3.4 Transmitter power line conducted emissions

Test location: ☐ OATS ☐ Anechoic Chamber ☐ Other

Test result: N/A

Frequency range: 0.15MHz-30MHz

Max. Emissions margin: dB below the limits

Notes: Testing not applicable as EUT is battery powered device.



3.5 Receiver/digital device radiated emissions

Test location: ☐ OATS ☒ Anechoic Chamber

Test distance: ☐ 10 meters ☒ 3 meters

Test result: **Pass**

Frequency range: 30MHz-12.5GHz

Max. Emissions margin: dB below the limits

Notes: The Radiated Emissions test was performed in the Anechoic chamber at 3m measurement distance (see Table 3.11.1 and Graphs 3.11.1 and 3.11.2)

Date:	September 20, 2010	Result: Pass
Standard:	FCC Part 15.109, Class B / RSS-310 3.1	
Tested by:	Richard Blonigen	
Test Point:	Enclosure	
Operation mode:	See Page 5	
Note:	Frequency Range 30-1000MHz	

Table 3.5.1

Frequency	Ant. Polarity	Peak Reading dB μ V	Ant.Factor dB1/m	Total at 3m dB μ V/m	QP Limit dB μ V/m	Margin dB
30.175 MHz	V	11.7	20.7	32.3	40.0	-7.7
51.996 MHz	V	21.0	9.4	30.3	40.0	-9.7
110.88 MHz	V	12.9	13.4	26.3	43.5	-17.2
980.29 MHz	V	12.8	26.4	39.2	54.0	-14.8
30.0 MHz	H	12.2	20.8	32.9	40.0	-7.1
117.05 MHz	H	13.3	13.9	27.3	43.5	-16.3
972.89 MHz	H	13.2	26.0	39.2	54.0	-14.8

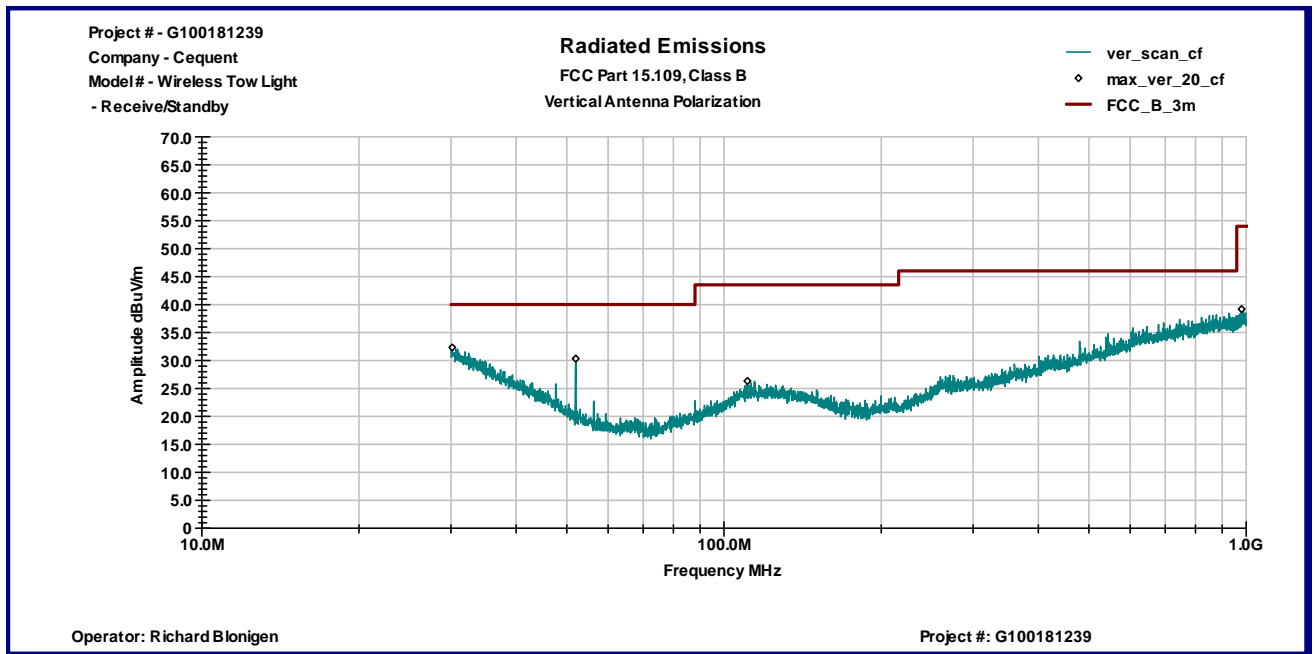
Date:	September 20, 2010	Result: Pass
Standard:	FCC Part 15.109, Class B / RSS-310 3.1	
Tested by:	Richard Blonigen	
Test Point:	Enclosure	
Operation mode:	See Page 5	
Note:	Frequency Range 1-12.5GHz	

Table 3.5.2

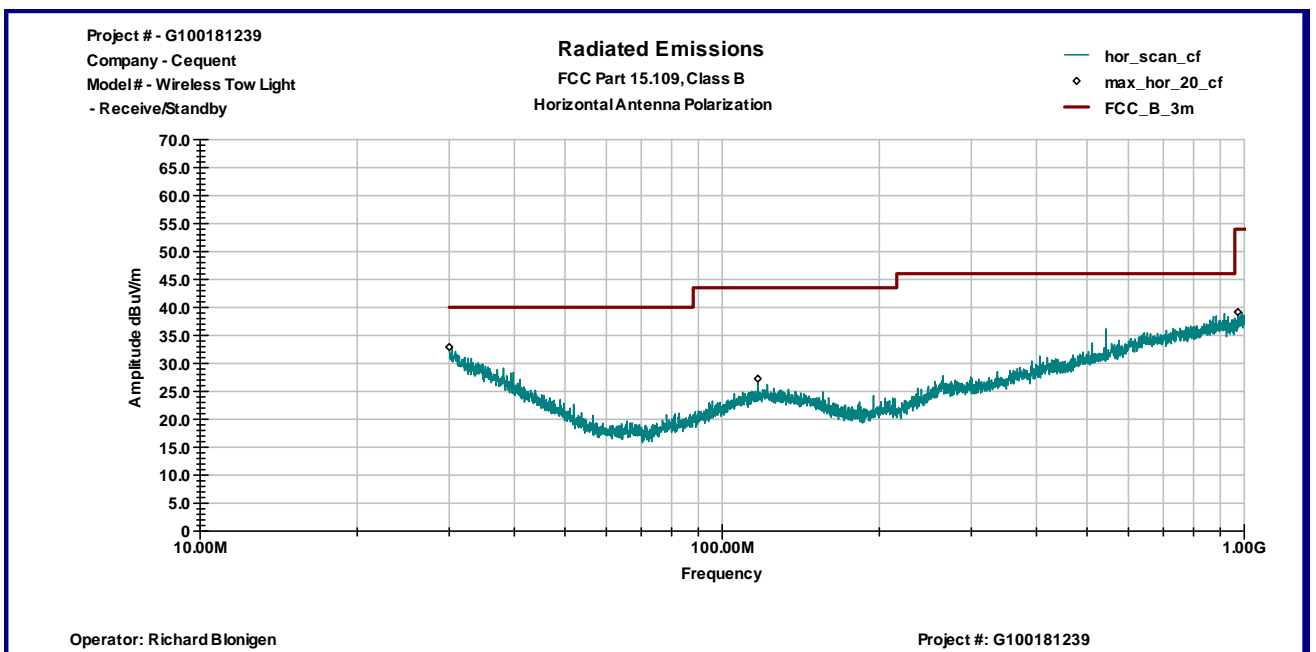
Frequency MHz	Antenna Polarity	Reading dBμV	Total C.F. dB1/m	Pre-Amp. Gain (dB)	Total at 3m dBμV/m	QP Limit dBμV/m	Margin dB
1.2853 GHz	V	49.6	27.3	38.9	37.9	54.0	-16.1
1.3307 GHz	V	50.6	27.5	38.9	39.1	54.0	-14.9
1.3467 GHz	V	49.7	27.5	38.9	38.3	54.0	-15.7
1.3733 GHz	V	49.7	27.6	38.9	38.4	54.0	-15.6
1.4507 GHz	V	48.9	27.9	38.9	37.8	54.0	-16.2
2.456 GHz	V	45.8	31.9	37.8	40.0	54.0	-14.0
1.296 GHz	H	51.1	27.3	38.9	39.4	54.0	-14.6
1.304 GHz	H	50.4	27.3	38.9	38.8	54.0	-15.2
1.3147 GHz	H	50.1	27.4	38.9	38.5	54.0	-15.5
1.3227 GHz	H	50.8	27.4	38.9	39.2	54.0	-14.8
1.3307 GHz	H	49.9	27.4	38.9	38.4	54.0	-15.6
1.3467 GHz	H	49.8	27.5	38.9	38.3	54.0	-15.7

Graph 3.5.1

Vertical antenna polarization

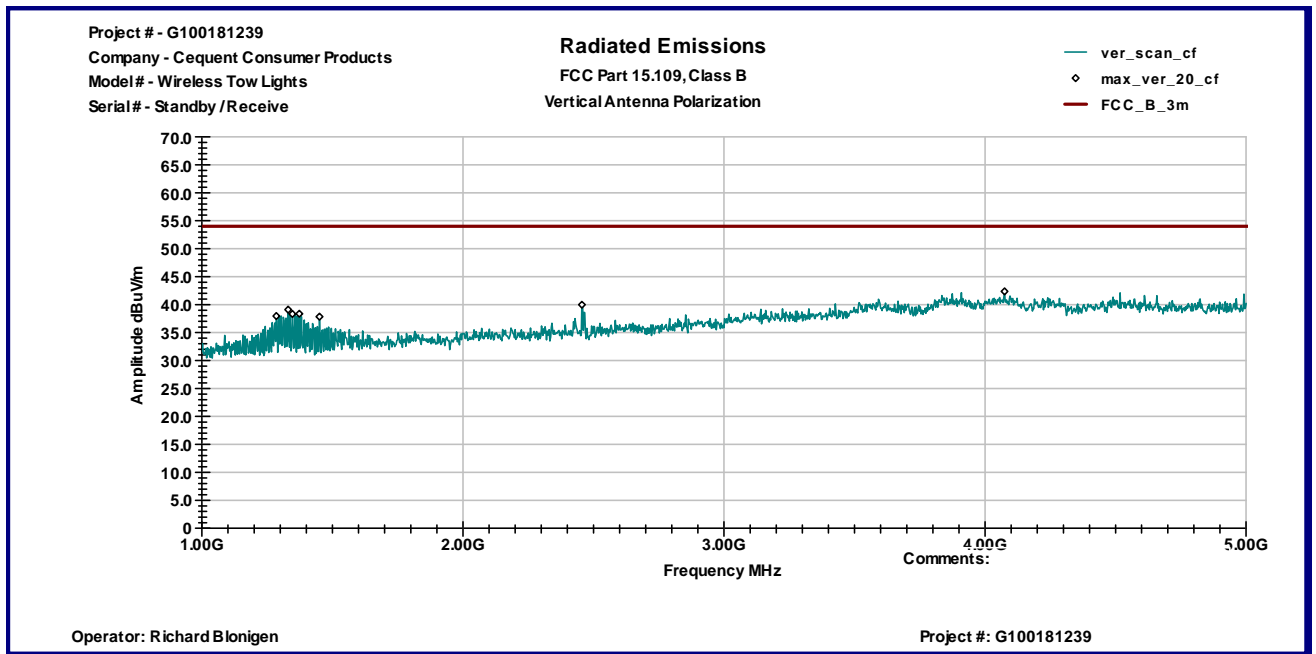


Horizontal antenna polarization

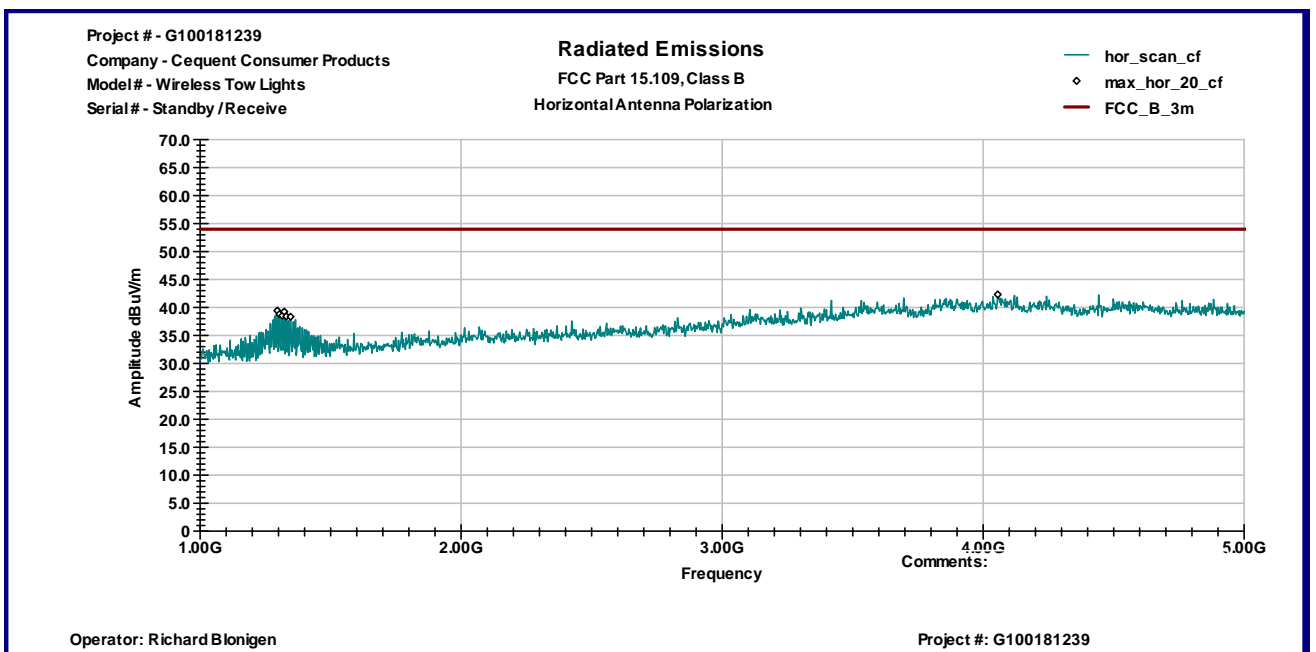


Graph 3.5.2

Vertical antenna polarization



Horizontal antenna polarization





3.6 Digital device conducted emissions

Test location: ☐ OATS ☐ Anechoic Chamber ☐ Other

Test result: N/A

Frequency range: 0.15MHz-30MHz

Max. Emissions margin: dB below the limits

Notes: It was determined from consideration of the electrical characteristics and usage of particular apparatus that Conducted Emissions testing is inappropriate and therefore unnecessary (as battery operated equipment).



4.0 TEST EQUIPMENT

DESCRIPTION	MANUFACTURER	MODEL	SERIAL NO.	INTERTEK ID	CAL DUE	USED
Spectrum Analyzer	R & S	FSP 40	100024	12559	12/07/2011	<input checked="" type="checkbox"/>
Spectrum Analyzer	R & S	ESCI	100358	12909	07/12/2011	<input checked="" type="checkbox"/>
Bicono-Log Antenna	Schaffner-Chase	CBL 6112 B	2468	14459	10/18/2011	<input checked="" type="checkbox"/>
Horn Antenna	EMCO	3115	9507-4513	9936	04/13/2011	<input checked="" type="checkbox"/>
Pre-Amplifier	MITEQ	AMF-5D-00501800-28-13P	1122951	13475	10/06/2011	<input checked="" type="checkbox"/>
Waveguide Horn Antenna	EMCO	3116	9904-2423	9705	10/04/2011	<input checked="" type="checkbox"/>
Pre-Amplifier	MITEQ	AMF-6F-16002600-25-10P	1222383	MIN-0065	10/06/2011	<input checked="" type="checkbox"/>
System	TILE! Instrument Control		Ver. 3.4.K.29	15259	VBV	<input checked="" type="checkbox"/>