



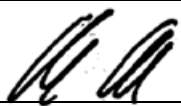

FCC PART 15, SUBPART C
ISED C RSS-247, ISSUE 2, FEBRUARY 2017
TEST REPORT

For

Hidrate, Inc

1400 Van Buren Street NE,
Minneapolis, MN 55413, USA

FCC ID: 2AURK003
IC: 25893-003

Report Type: Original Report	Product Type: Bluetooth Enabled Smart Water Bottle
Prepared By: Christopher Casteel Test Technician	
Report Number: R2002104-247	
Report Date: 2020-07-01	
Reviewed By: Simon Ma RF Supervisor	
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*, NIST, 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 "*" (Rev 2)

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 Objective.....	5
1.4 Test Methodology	5
1.5 Measurement Uncertainty	6
1.6 Test Facility Registrations	6
1.7 Test Facility Accreditations	6
2 System Test Configuration.....	9
2.1 Justification.....	9
2.2 EUT Exercise Software.....	9
2.3 Duty Cycle Correction Factor	10
2.4 Equipment Modifications.....	11
2.5 Local Support Equipment	12
2.6 Remote Support Equipment.....	12
2.7 Interface Ports and Cabling.....	12
3 Summary of Test Results	13
4 FCC §15.203 & ISEDC RSS-Gen §6.8 - Antenna Requirements	14
4.1 Applicable Standards	14
4.2 Antenna Description	14
5 FCC §2.1093, §15.247(i) & ISEDC RSS-102 - RF Exposure.....	15
5.1 Applicable Standards	15
5.2 RF Exposure Evaluation Exemption for FCC.....	16
5.3 RF Exposure Evaluation Exemption for IC	16
6 FCC §15.209, §15.247(d) & ISEDC RSS-247 §5.5, RSS-Gen §8.9, §8.10 - Spurious Radiated Emissions.....	17
6.1 Applicable Standards	17
6.2 Test Setup	19
6.3 Test Procedure	19
6.4 Corrected Amplitude and Margin Calculation	19
6.5 Test Equipment List and Details.....	20
6.6 Test Environmental Conditions	20
6.7 Summary of Test Results	21
6.8 Radiated Emissions Test Results	22
7 FCC §15.247(a) (2) & ISEDC RSS-247 §5.2 -Emission Bandwidth	27
7.1 Applicable Standards	27
7.2 Measurement Procedure.....	27
7.3 Test Equipment List and Details.....	27
7.4 Test Environmental Conditions	27
7.5 Test Results.....	28
8 FCC §15.247(b) (3) & ISEDC RSS-247 §5.4 (4) - Output Power Measurement	32
8.1 Applicable Standards	32
8.2 Measurement Procedure.....	32
8.3 Test Equipment List and Details.....	32
8.4 Test Environmental Conditions	32
8.5 Test Results.....	33
9 FCC §15.247(d) and ISEDC RSS-247 §5.5 – 100 kHz Bandwidth of Band Edges.....	34
9.1 Applicable Standards	34
9.2 Measurement Procedure.....	34
9.3 Test Equipment List and Details.....	34
9.4 Test Environmental Conditions	34
9.5 Test Results.....	35
10 FCC §15.247(e) & ISEDC RSS-247 §5.2(2) – Power Spectral Density	36

10.1	Applicable Standards	36
10.2	Measurement Procedure.....	36
10.3	Test Equipment List and Details	36
10.4	Test Environmental Conditions	36
10.5	Test Results.....	37
11	FCC §15.247(d) & ISERC RSS-247 §5.5, RSS-GEN §8.9 – Spurious Emissions at Antenna Terminals.....	39
11.1	Applicable Standards	39
11.2	Test Procedure	39
11.3	Test Equipment List and Details.....	39
11.4	Test Environmental Conditions	39
11.5	Test Results.....	40
12	Annex A (Normative) – EUT Test Setup Photographs.....	43
13	Annex B (Normative) – EUT External Photographs	44
14	Annex C (Normative) – EUT Internal Photographs.....	45
15	Annex D (Normative) - A2LA Electrical Testing Certificate.....	46

DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R2002104-247	Original Report	2020-07-01

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test and measurement report was prepared on behalf of *Hidrate, Inc*, and their product model: SENSOR-003-GREEN and a similar model SENSOR-003-RED, FCC ID: 2AURK003; IC: 25893-003 or the “EUT” as referred to in this report. It is a Sensor for Bluetooth Enabled Smart Water Bottle. The EUT operates in the frequency range: 2402 – 2480 MHz.

The two models are electrically identical, SENSOR-003-GREEN was selected for testing. Please refer to the declaration letter submitted by the manufacturer.

1.2 Mechanical Description of EUT

The Hidrate Spark 3 measures approximately 6 cm (Ø) x 26 cm (H) and weighs approximately 0.3372 kg.

The data gathered are from the typical production sample provided by Hidrate, Inc with serial number: R2002104-1. Serial numbers were provided by BACL.

1.3 Objective

This report was prepared on behalf of *Hidrate, Inc*, in accordance with Part 2, Subpart J, and Part 15, Subparts B and C of the Federal Communication Commission’s rules and ISEDC RSS-247 Issue 2, February 2017.

The objective was to determine compliance with FCC Part 15.247 and ISEDC RSS-247 rules for Output Power, Antenna Requirements, 6 dB Bandwidth, Power Spectral Density, 100 kHz Bandwidth of Band Edges Measurement, and Conducted and Radiated Spurious Emissions.

1.4 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2013, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices and FCC KDB 558074 D01 DTS Meas Guidance v05r2: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247.

1.5 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the 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.

Parameter	Measurement uncertainty
Occupied Channel Bandwidth	±5 %
RF output power, conducted	±0.57 dB
Power Spectral Density, conducted	±1.48dB
Unwanted Emissions, conducted	±1.57dB
All emissions, radiated	±4.0 dB
AC power line Conducted Emission	±2.0 dB
Temperature	±2 ° C
Humidity	±5 %
DC and low frequency voltages	±1.0 %
Time	±2 %
Duty Cycle	±3 %

1.6 Test Facility Registrations

BACLs test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Industry Canada under Registration Numbers: 3062A-1, 3062A-2, and 3062A-3.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0027.

1.7 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

A- An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2005 by A2LA (Test Laboratory Accreditation Certificate Number 3297.02), in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2005 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report..

BACL's ISO/IEC 17025:2005 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio, RF Exposure, Safety and wireline Telecommunications test methods applicable to a wide range of product categories. These product categories include Central Office Telecommunications Equipment [including NEBS - Network Equipment Building Systems], Unlicensed and Licensed Wireless and RF devices,

Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial and Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, and Energy Efficient Lighting.

B- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.03) to certify

- For the USA (Federal Communications Commission):
 - 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
 - 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
 - 3- All Telephone Terminal Equipment within FCC Scope C.
- For the Canada (Industry Canada):
 - 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
 - 2 All Scope 2-Licensed Personal Mobile Radio Services;
 - 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
 - 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
 - 5 All Scope 5-Licensed Fixed Microwave Radio Services
 - 6 All Broadcasting Technical Standards (BETS) in the Category I Equipment Standards List.
- For Singapore (Info-Communications Development Authority (IDA)):
 - 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2
 - 2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2
- For the Hong Kong Special Administrative Region:
 - 1 All Radio Equipment, per KHCA 10XX-series Specifications;
 - 2 All GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications;
 - 3 All Fixed Network Equipment, per HKCA 20XX-series Specifications.
- For Japan:
 - 1 MIC Telecommunication Business Law (Terminal Equipment):
 - All Scope A1 - Terminal Equipment for the Purpose of Calls;
 - All Scope A2 - Other Terminal Equipment
 - 2 Radio Law (Radio Equipment):
 - All Scope B1 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
 - All Scope B2 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
 - All Scope B3 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

C- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.01) to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

- 1 Electronics and Office Equipment:
 - for Telephony (ver. 3.0)
 - for Audio/Video (ver. 3.0)
 - for Battery Charging Systems (ver. 1.1)
 - for Set-top Boxes & Cable Boxes (ver. 4.1)
 - for Televisions (ver. 6.1)
 - for Computers (ver. 6.0)
 - for Displays (ver. 6.0)
 - for Imaging Equipment (ver. 2.0)
 - for Computer Servers (ver. 2.0)
- 2 Commercial Food Service Equipment

- for Commercial Dishwashers (ver. 2.0)
- for Commercial Ice Machines (ver. 2.0)
- for Commercial Ovens (ver. 2.1)
- for Commercial Refrigerators and Freezers
- 3 Lighting Products
 - For Decorative Light Strings (ver. 1.5)
 - For Luminaires (including sub-components) and Lamps (ver. 1.2)
 - For Compact Fluorescent Lamps (CFLs) (ver. 4.3)
 - For Integral LED Lamps (ver. 1.4)
- 4 Heating, Ventilation, and AC Products
 - for Residential Ceiling Fans (ver. 3.0)
 - for Residential Ventilating Fans (ver. 3.2)
- 5 Other
 - For Water Coolers (ver. 3.0)

D- A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:

- Australia: ACMA (Australian Communication and Media Authority) – APEC Tel MRA -Phase I;
- Canada: (Innovation, Science and Economic development Canada - ISED) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II;
- Chinese Taipei (Republic of China – Taiwan):
 - o BSMI (Bureau of Standards, Metrology and Inspection) APEC Tel MRA -Phase I;
 - o NCC (National Communications Commission) APEC Tel MRA -Phase I;
- European Union:
 - o EMC Directive 2014/30/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Radio Equipment (RE) Directive 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
 - o Low Voltage Directive (LVD) 2014/35/EU
- Hong Kong Special Administrative Region: (Office of the Telecommunications Authority – OFTA) APEC Tel MRA -Phase I & Phase II
- Israel – US-Israel MRA Phase I
- Republic of Korea (Ministry of Communications - Radio Research Laboratory) APEC Tel MRA -Phase I
- Singapore: (Infocomm Media Development Authority - IMDA) APEC Tel MRA -Phase I & Phase II;
- Japan: VCCI - Voluntary Control Council for Interference US-Japan Telecom Treaty VCCI Side Letter-
- USA:
 - o ENERGY STAR Recognized Test Laboratory – US EPA
 - o Telecommunications Certification Body (TCB) – US FCC;
 - o Nationally Recognized Test Laboratory (NRTL) – US OSHA
- Vietnam: APEC Tel MRA -Phase I;

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI C63.10-2013 and FCC KDB 558074 D01 DTS Meas Guidance v05r02.

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

The worst-case data rates are determined to be as follows for each mode based upon investigation by measuring the average power, peak power and PPSD across all data rates bandwidths, and modulations.

2.2 EUT Exercise Software

The test software used was TeraTerm, the EUT firmware is compliant with the standard requirements being tested against.

Modulation	Frequency (MHz)	Power Setting
BLE	2402	-1
	2440	-1
	2480	-1

2.3 Duty Cycle Correction Factor

According to KDB 558074 D01 DTS Meas Guidance v05r02 section 6.0:

Preferably, all measurements of maximum conducted (average) output power will be performed with the EUT transmitting continuously (i.e., with a duty cycle of greater than or equal to 98%). When continuous operation cannot be realized, then the use of sweep triggering/signal gating techniques can be utilized to ensure that measurements are made only during transmissions at the maximum power control level. Such sweep triggering/signal gating techniques will require knowledge of the minimum transmission duration (T) over which the transmitter is on and is transmitting at its maximum power control level for the tested mode of operation. Sweep triggering/signal gating techniques can then be used if the measurement/sweep time of the analyzer can be set such that it does not exceed T at any time that data is being acquired (i.e., no transmitter off-time is to be considered).

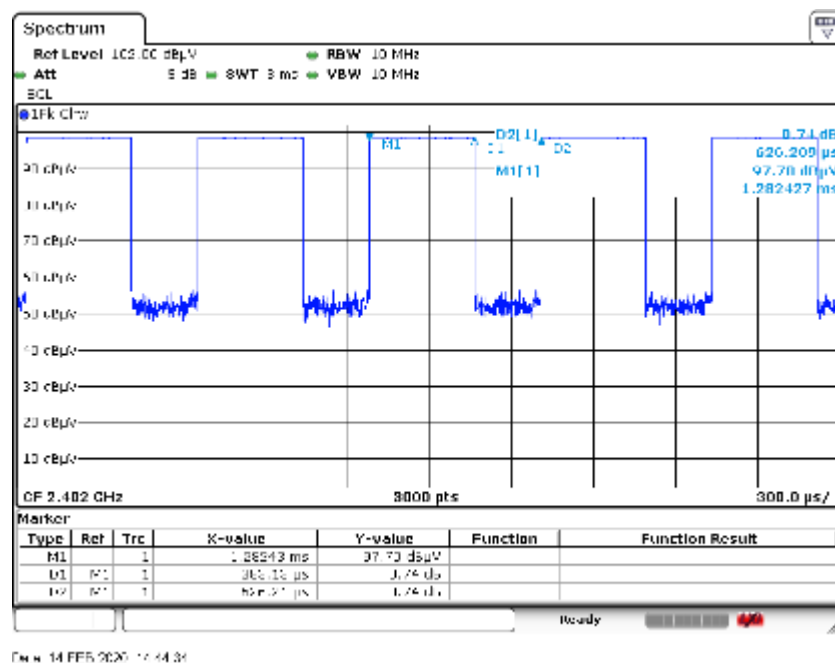
Radio Mode	On Time (μs)	Period (μs)	Duty Cycle (%)	Duty Cycle Correction Factor for (dB)	
				Power Measurement (dB)	Field Strength Measurement (dB)
Test Mode	0.383	0.626	61.18	2.13	4.27

Radio Mode	On Time per Pulse (μs)	Max. Number of pulses in 100ms	Duty Cycle (%)	Duty Cycle Correction Factor for Field Strength Measurement (dB)
Normal Operation	1140	2	2.28	32.84

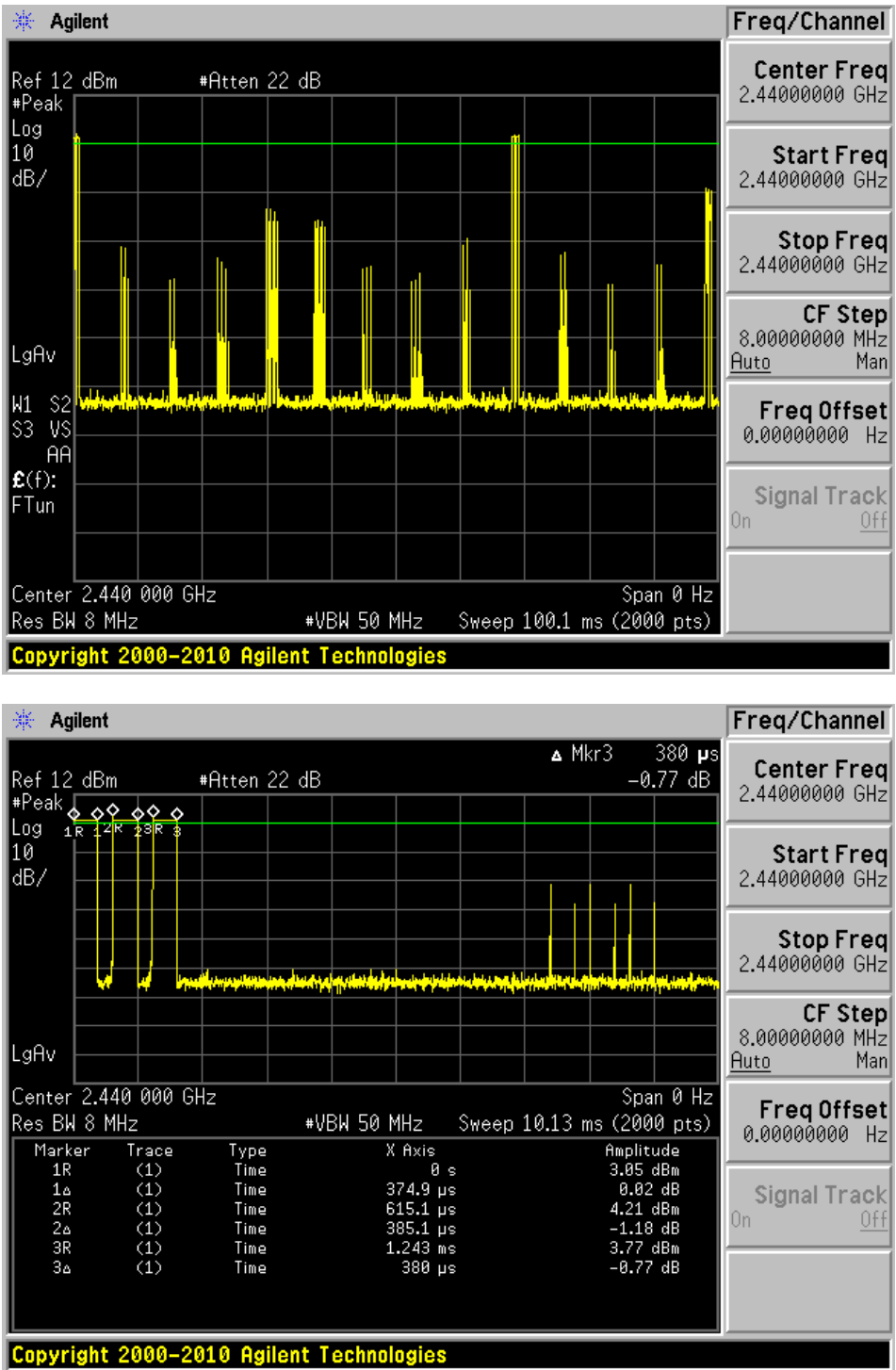
Duty Cycle = On Time (ms)/ Period (ms) for periodic signal; Total On Time within 100ms/100ms for pulsed signal.

Duty Cycle Correction Factor (dB) = $10 \cdot \log(1/\text{Duty Cycle})$ for power measurement or $20 \cdot \log(1/\text{Duty Cycle})$ for field strength measurement.

Test Mode



Normal Operation



2.4 Equipment Modifications

None

2.5 Local Support Equipment

None.

2.6 Remote Support Equipment

None.

2.7 Interface Ports and Cabling

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

3 Summary of Test Results

Results reported relate only to the product tested.

FCC and ISEDC Rules	Description of Test	Results
FCC §15.203 ISEDC RSS-Gen §6.8	Antenna Requirement	Compliant
FCC §2.1093, §15.247(i) ISEDC RSS-102	RF Exposure	Compliant
FCC §15.207 (d) ISEDC RSS-Gen §8.8	AC Power Line Conducted Emissions	N/A*
FCC §2.1053, §15.205, §15.209, §15.247 (d) ISEDC RSS-247 §5.5 ISEDC RSS-Gen §8.9 and §8.10	Radiated Spurious Emissions	Compliant
FCC §2.1051, §15.247 (d) ISEDC RSS-247 §5.5	Spurious Emissions at Antenna Port	Compliant
FCC §15.247(a)(2) ISEDC RSS-247 §5.2 (1)	6 dB and 99% Emission Bandwidth	Compliant
FCC §15.247(b)(3) ISEDC RSS-247 §5.4 (4)	Maximum Peak Output Power	Compliant
FCC §15.247(d) ISEDC RSS-247 §5.5	100 kHz Bandwidth of Frequency Band Edge	Compliant
FCC §15.247(e) ISEDC RSS-247 §5.2 (2)	Power Spectral Density	Compliant

Note: The EUT is powered by a single CR2477 battery only, AC Power Line Conducted Emissions test does not apply.

4 FCC §15.203 & ISEDC RSS-Gen §6.8 - Antenna Requirements

4.1 Applicable Standards

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.

According to ISEDC RSS-Gen §6.8: Transmitter Antenna

The applicant for equipment certification shall provide a list of all antenna types that may be used with the transmitter, where applicable (i.e. for transmitters with detachable antenna), indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna. The test report shall demonstrate the compliance of the transmitter with the limit for maximum equivalent isotropically radiated power (e.i.r.p.) specified in the applicable RSS, when the transmitter is equipped with any antenna type, selected from this list.

For expediting the testing, measurements may be performed using only the antenna with highest gain of each combination of transmitter and antenna type, with the transmitter output power set at the maximum level. However, the transmitter shall comply with the applicable requirements under all operational conditions and when in combination with any type of antenna from the list provided in the test report (and in the notice to be included in the user manual, provided below).

When measurements at the antenna port are used to determine the RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna's manufacturer.

The test report shall state the RF power, output power setting and spurious emission measurements with each antenna type that is used with the transmitter being tested.

For licence-exempt equipment with detachable antennas, the user manual shall also contain the following notice in a conspicuous location:

This radio transmitter [enter the device's ISED certification number] has been approved by Innovation, Science and Economic Development Canada to operate with the antenna types listed below, with the maximum permissible gain indicated. Antenna types not included in this list that have a gain greater than the maximum gain indicated for any type listed are strictly prohibited for use with this device.

Immediately following the above notice, the manufacturer shall provide a list of all antenna types which can be used with the transmitter, indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna type.

4.2 Antenna Description

The antennas used by the EUT are permanent attached antennas.

Antenna usage	Frequency Range (MHz)	Maximum Antenna Gain (dBi)
SMT Chip Antenna	2400 - 2500	0.5

5 FCC §2.1093, §15.247(i) & ISEDC RSS-102 - RF Exposure

5.1 Applicable Standards

According to FCC KDB 447498 D01 General RF Exposure Guidance v06 Section 4.3.1, Unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition, listed below, is satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions. The minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander (see 5) of section 4.1). To qualify for SAR test exclusion, the test separation distances applied must be fully explained and justified by the operating configurations and exposure conditions of the transmitter and applicable host platform requirements, typically in the SAR measurement or SAR analysis report, according to the required published RF exposure KDB procedures. When no other RF exposure testing or reporting is required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for the SAR test exclusion. When required, the device specific conditions described in the other published RF exposure KDB procedures must be satisfied before applying these SAR test exclusion provisions; for example, handheld PTT two-way radios, handsets, laptops & tablets etc.

- 1) The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

$$\left[\frac{(\text{max. power of channel, including tune-up tolerance, mW})}{(\text{min. test separation distance, mm})} \right] \cdot \sqrt{f(\text{GHz})} \leq 3.0 \text{ for 1-g SAR and } \leq 7.5 \text{ for 10-g extremity SAR, where}$$

- $f(\text{GHz})$ is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison
- 3.0 and 7.5 are referred to as the numeric thresholds in the step 2 below

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm according to 5) in section 4.1 is applied to determine SAR test exclusion.

- 2) At 100 MHz to 6 GHz and for test separation distances > 50 mm, the SAR test exclusion threshold is determined according to the following, and as illustrated in Appendix B:
 - a) [Power allowed at numeric threshold for 50 mm in step 1) + (test separation distance - 50 mm) · ($f(\text{MHz})/150$)] mW, at 100 MHz to 1500 MHz
 - b) [Power allowed at numeric threshold for 50 mm in step 1) + (test separation distance - 50 mm) · 10] mW at > 1500 MHz and ≤ 6 GHz
- 3) At frequencies below 100 MHz, the following may be considered for SAR test exclusion, and as illustrated in Appendix C:
 - a) The power threshold at the corresponding test separation distance at 100 MHz in step 2) is multiplied by $[1 + \log(100/f(\text{MHz}))]$ for test separation distances > 50 mm and < 200 mm
 - b) The power threshold determined by the equation in a) for 50 mm and 100 MHz is multiplied by $\frac{1}{2}$ for test separation distances ≤ 50 mm
 - c) SAR measurement procedures are not established below 100 MHz. When SAR test exclusion cannot be applied, a KDB inquiry is required to determine SAR evaluation requirements for any test results to be acceptable.

According to ISSED RSS-102 Issue 5 Section 2.5.1 Exemption Limits for Routine Evaluation-SAR Evaluation:

SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or below the applicable output power level (adjusted for tune-up tolerance) for the specified separation distance defined in table below,

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of ≤5 mm	At separation distance of 10 mm	At separation distance of 15 mm	At separation distance of 20 mm	At separation distance of 25 mm
≤300	71	101	132	162	193
450	52	70	88	106	123
835	17	30	42	55	67
1900	7	10	18	34	60
2450	4	7	15	30	52
3500	2	6	16	32	55
5800	1	6	15	27	41

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of 30 mm	At separation distance of 35 mm	At separation distance of 40 mm	At separation distance of 45 mm	At separation distance of ≥50 mm
≤300	223	254	284	315	345
450	141	159	177	195	213
835	80	92	105	117	130
1900	99	153	225	316	431
2450	83	123	173	235	309
3500	86	124	170	225	290
5800	56	71	85	97	106

5.2 RF Exposure Evaluation Exemption for FCC

The maximum conducted output power measured from the EUT is -1.52 dBm (0.70 mW).

$[(\text{max. power of channel, including tune-up tolerance, mW})/(\text{min. test separation distance, mm})] [\sqrt{f(\text{GHz})}] = (0.70 \text{ mW}/5\text{mm}) * \sqrt{2.402} = 0.22$, which is less than 3.0. Therefore, FCC SAR testing is excluded.

5.3 RF Exposure Evaluation Exemption for IC

Maximum EIRP power = -1.52 dBm + 0.5 dBi = -1.02 dBm (0.79 mW), which is less than 4 mW. Therefore, IC SAR testing is not required.

6 FCC §15.209, §15.247(d) & ISEDC RSS-247 §5.5, RSS-Gen §8.9, §8.10 - Spurious Radiated Emissions

6.1 Applicable Standards

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 §15.205(a) and RSS-Gen 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
0.090 – 0.110	16.42 – 16.423	960 – 1240	4. 5 – 5. 15
0.495 – 0.505	16.69475 – 16.69525	1300 – 1427	5. 35 – 5. 46
2.1735 – 2.1905	25.5 – 25.67	1435 – 1626.5	7.25 – 7.75
4.125 – 4.128	37.5 – 38.25	1645.5 – 1646.5	8.025 – 8.5
4.17725 – 4.17775	73 – 74.6	1660 – 1710	9.0 – 9.2
4.20725 – 4.20775	74.8 – 75.2	1718.8 – 1722.2	9.3 – 9.5
6.215 – 6.218	108 – 121.94	2200 – 2300	10.6 – 12.7
6.26775 – 6.26825	123 – 138	2310 – 2390	13.25 – 13.4
6.31175 – 6.31225	149.9 – 150.05	2483.5 – 2500	14.47 – 14.5
8.291 – 8.294	156.52475 – 156.52525	2690 – 2900	15.35 – 16.2
8.362 – 8.366	156.7 – 156.9	3260 – 3267	17.7 – 21.4
8.37625 – 8.38675	162.0125 – 167.17	3.332 – 3.339	22.01 – 23.12
8.41425 – 8.41475	167.72 – 173.2	3 3458 – 3 358	23.6 – 24.0
12.29 – 12.293	240 – 285	3.600 – 4.400	31.2 – 31.8
12.51975 – 12.52025	322 – 335.4		36.43 – 36.5
12.57675 – 12.57725	399.9 – 410		Above 38.6
13.36 – 13.41	608 – 614		

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 §15.247 (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 §15.209(a) (see §15.205(c)).

As per ISED RSS-Gen 8.9,

Except when the requirements applicable to a given device state otherwise, emissions from licence-exempt transmitters shall comply with the field strength limits shown in Table 4 or Table 5 below. Additionally, the level of any transmitter emission shall not exceed the level of the transmitter's fundamental emission.

Table 4 – General Field Strength Limits for Licence-Exempt Transmitters at Frequencies Above 30 MHz

Frequency (MHz)	Field Strength ($\mu\text{V/m}$ at 3 metres)
30-88	100
88-216	150
216-960	200
Above 960*	500

* Unless otherwise specified, for all frequencies greater than 1 GHz, the radiated emission limits for license-exempt radio apparatus stated in applicable RSSs (including RSS-Gen) are based on measurements using a linear average detector function having a minimum resolution bandwidth of 1 MHz. If an average limit is specified for the EUT, then the peak emission shall also be measured with instrumentation properly adjusted for such factors as pulse desensitization to ensure the peak emission is less than 20 dB above the average limit.

Note: Transmitting devices are not permitted in restricted frequency bands unless stated otherwise in the specific RSS.

As per ISED RSS-247 §5.5, in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced 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 that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

6.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.10-2013. The specification used was the FCC 15 Subpart C and ISERC RSS-247 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.

6.3 Test Procedure

For the radiated emissions test, the EUT host, and all support equipment power cords were 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 was set 3 meter away from the testing antenna, which was varied from 1-4 meter, and the EUT was placed on a turntable, which was 0.8 meter and 1.5 meter above the ground plane for below and above 1000 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna's polarity should be changed between horizontal and vertical.

The spectrum analyzer or receiver was set as:

Below 1000 MHz:

RBW = 100 kHz / VBW = 300 kHz / Sweep = Auto

Above 1000 MHz:

(1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto

(2) Average: RBW = 1MHz / VBW = 10Hz or 1/T / Sweep = Auto

6.4 Corrected Amplitude and Margin Calculation

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$CA = Ai + AF + CL + Atten - Ga$$

For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

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:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

6.5 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
HP	Spectrum Analyzer	E4446A	US44300386	2019-08-24	1 year
Rhode & Schwarz	EMI Test Receiver	ESCI 1166.5950.03	100338	2018-07-05	2 years
Sunol Sciences	System Controller	SC110V	122303-1	N/R	N/A
Sunol Sciences	Biconi-Log Antenna	JB3	A020106-2	2019-11-20	2 years
ETS Lindgren	Horn Antenna	3117	00218973	2019-02-13	2 years
HP	Pre-Amplifier	8447D	2443A04374	2019-08-13	1 year
IW Microwave	150 Series 2.92mm Cable	KPS1501AN- 3780-KPS	DC 1925	2019-09-11	1 year
-	SMA cable	-	-	Each time ¹	N/A
MDP Digital	Times Microwave LMR 400 UltraFex Coaxial Cable 35'	LMR400UF	1904161	2020-05-20	1 year
Agilent	Pre-Amplifier	8449B	3147A00400	2020-02-27	1 year
AH Systems	Pre-Amplifier	PAM 1840 VH	170	2019-09-24	1 year
Wisewave	Horn Antenna	ARH-4223-02	10555-02	2020-02-05	2 years
Vasona	Test Software	V6.0 build 11	10400213	N/R	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

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

6.6 Test Environmental Conditions

Temperature:	24 °C
Relative Humidity:	32 %
ATM Pressure:	101.3 kPa

The testing was performed by Matthew Riego de Dios on 2020-06-17 in 5m chamber 3.

6.7 Summary of Test Results

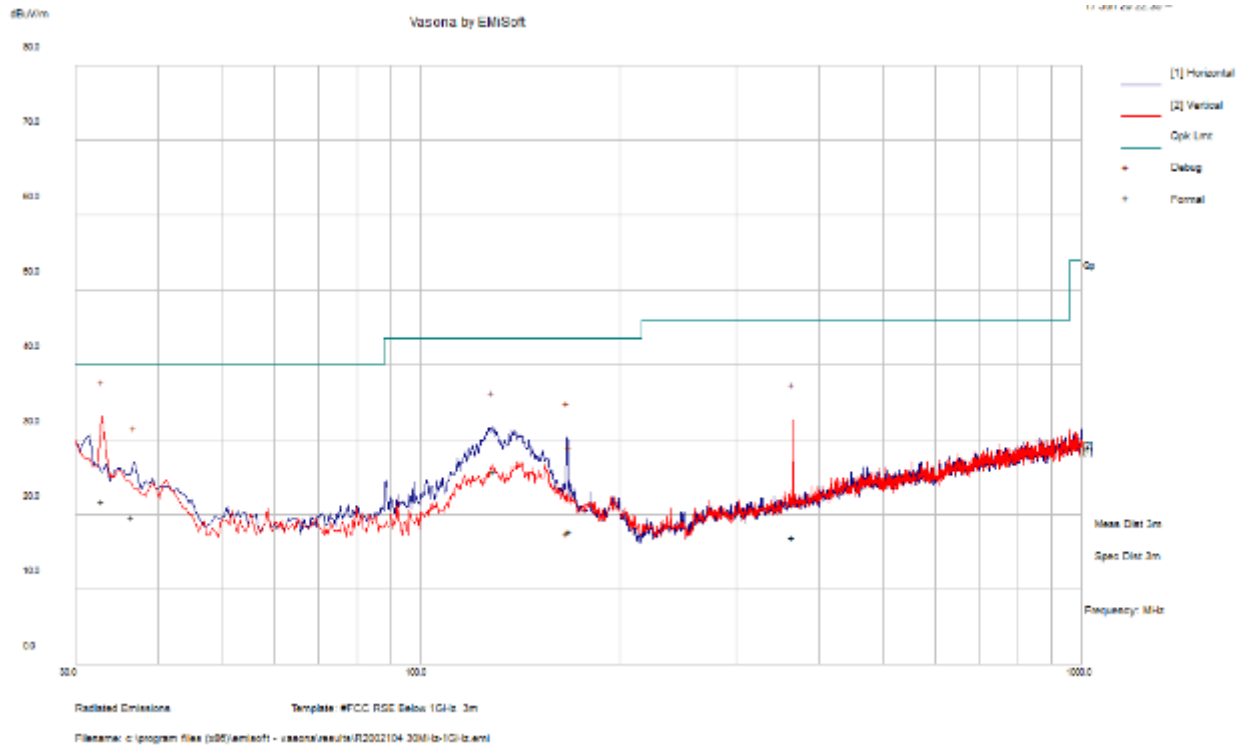
According to the data hereinafter, the EUT complied with FCC Title 47, Part 15C and ISEDC RSS-247 standard's radiated emissions limits, and had the worst margin of:

Mode: Transmitting & Charging Mode			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Channel
-0.27	2483.5	Horizontal	High (2480 MHz)

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

6.8 Radiated Emissions Test Results

1) 30 MHz – 1 GHz worst case, measured at 3 meters



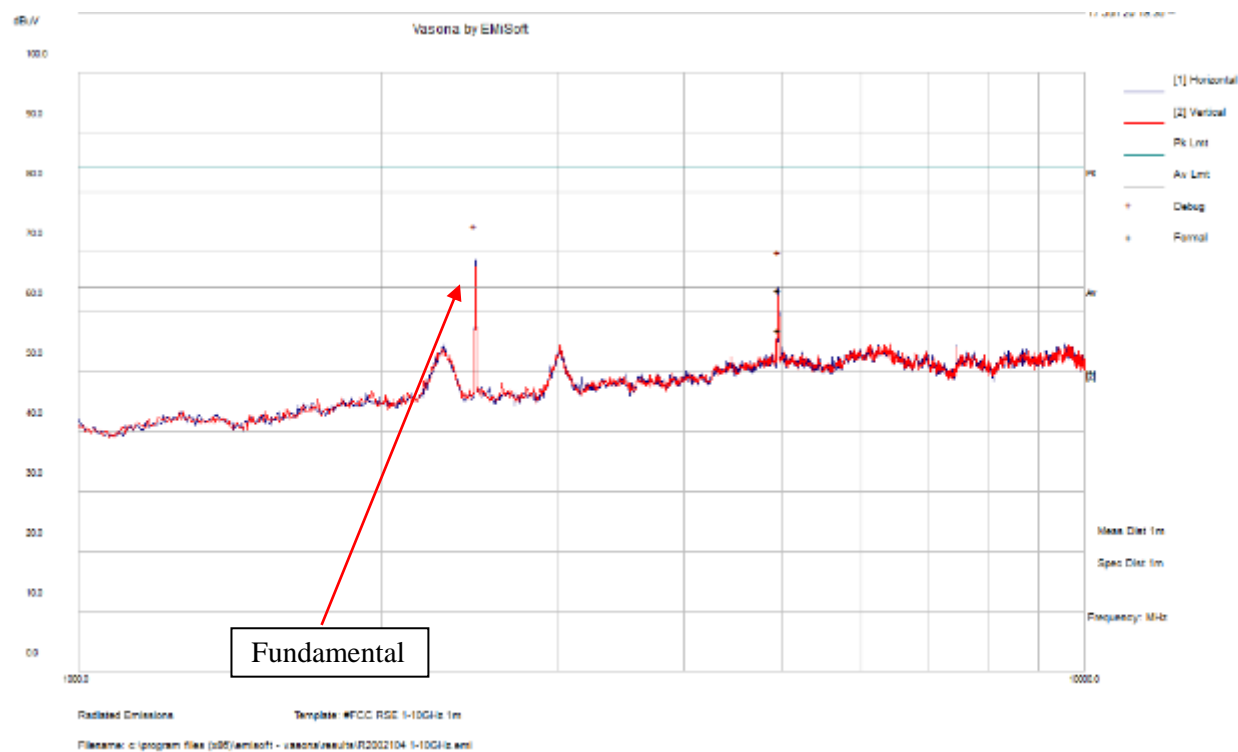
Frequency (MHz)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Comment
32.96	21.85	249	V	310	40	-18.15	Pass
128.7433	25.83	285	H	87	43.5	-17.67	Pass
36.58275	19.87	191	H	217	40	-20.13	Pass
166.4285	17.44	194	H	353	43.5	-26.06	Pass
365.5333	17.11	182	V	71	46	-28.89	Pass
167.5365	17.78	266	H	119	43.5	-25.72	Pass

2) 1–25 GHz, measured at 3 meters

Frequency (MHz)	S.A. Reading (dBµV)	Turntable Azimuth (degrees)	Test Antenna			Cable Loss (dB)	Pre- Amp. (dB)	Cord. Reading (dBµV/m)	FCC/ISED		Comments
			Height (cm)	Polarity (H/V)	Factor (dB/m)				Limit (dBµV/m)	Margin (dB)	
Low Channel 2402 MHz											
2390	53.87	145	130	V	32.6	6.33	36.34	56.46	74	-17.54	Peak
2390	58.24	240	170	H	32.6	6.33	36.34	60.83	74	-13.17	Peak
2390	21.03	145	130	V	32.6	6.33	36.34	23.62	54	-30.38	Ave
2390	25.4	240	170	H	32.6	6.33	36.34	27.99	54	-26.01	Ave
4804	49.49	344	288	V	35	9.89	35.43	58.95	74	-15.05	Peak
4804	49.41	52	212	H	35	9.89	35.43	58.87	74	-15.13	Peak
4804	16.65	344	288	V	35	9.89	35.43	26.11	54	-27.89	Ave
4804	16.57	52	212	H	35	9.89	35.43	26.03	54	-27.97	Ave
7206	47.2	0	100	V	36.1	9.83	35.82	57.31	74	-16.69	Peak
7206	47.07	0	100	H	36.1	9.83	35.82	57.18	74	-16.82	Peak
7206	14.36	0	100	V	36.1	9.83	35.82	24.47	54	-29.53	Ave
7206	14.23	0	100	H	36.1	9.83	35.82	24.34	54	-29.66	Ave
Middle Channel 2440 MHz											
4880	47.76	235	123	V	35.2	10.96	35.43	58.49	74	-15.51	Peak
4880	50.8	272	127	H	35.2	10.96	35.43	61.53	74	-12.47	Peak
4880	14.92	235	123	V	35.2	10.96	35.43	25.65	54	-28.35	Ave
4880	17.96	272	127	H	35.2	10.96	35.43	28.69	54	-25.31	Ave
7320	46.73	0	100	V	36.1	10.95	35.82	57.96	74	-16.04	Peak
7320	46.61	0	100	H	36.1	10.95	35.82	57.84	74	-16.16	Peak
7320	13.89	0	100	V	36.1	10.95	35.82	25.12	54	-28.88	Ave
7320	13.77	0	100	H	36.1	10.95	35.82	25	54	-29	Ave
High Channel 2480 MHz											
2483.5	63.45	164	100	V	33	5.65	36.34	65.76	74	-8.24	Peak
2483.5	71.42	72	268	H	33	5.65	36.34	73.73	74	-0.27	Peak
2483.5	30.61	164	100	V	33	5.65	36.34	32.92	54	-21.08	Ave
2483.5	38.58	72	268	H	33	5.65	36.34	40.89	54	-13.11	Ave
4960	48.04	229	100	V	35.4	11.07	35.43	59.08	74	-14.92	Peak
4960	50.88	271	112	H	35.4	11.07	35.43	61.92	74	-12.08	Peak
4960	15.2	229	100	V	35.4	11.07	35.43	26.24	54	-27.76	Ave
4960	18.04	271	112	H	35.4	11.07	35.43	29.08	54	-24.92	Ave
7440	47.37	0	100	V	36.1	12.73	35.9	60.3	74	-13.7	Peak
7440	47.01	0	100	H	36.1	12.73	35.9	59.94	74	-14.06	Peak
7440	14.53	0	100	V	36.1	12.73	35.9	27.46	54	-26.54	Ave
7440	14.17	0	100	H	36.1	12.73	35.9	27.1	54	-26.9	Ave

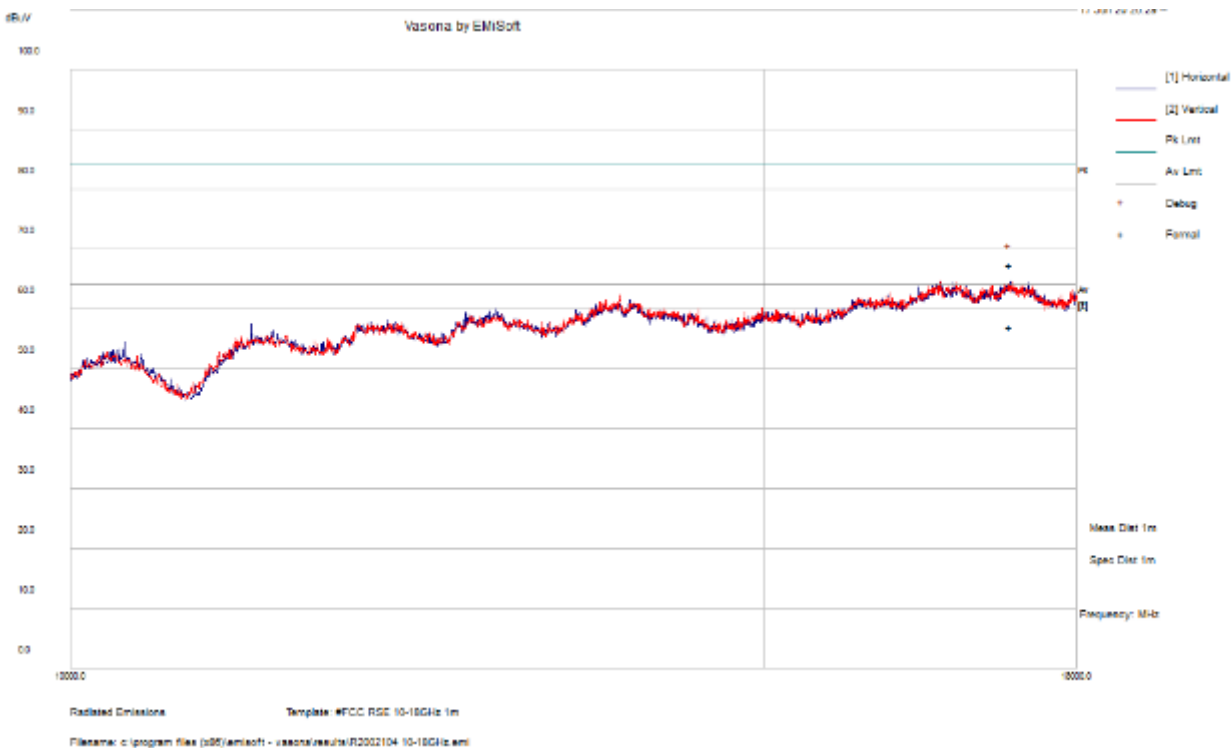
Note: Average emission level was derived from the measured peak emission level in accordance with FCC KDB 558074 D01 Q&A #3. Average Field Strength = Peak Field Strength – Duty Cycle Correction Factor. Please refer to Section 2.3 of this report for detailed duty cycle measurement and duty cycle correction factor calculation.

3) 1-10 GHz, measured at 1 meter



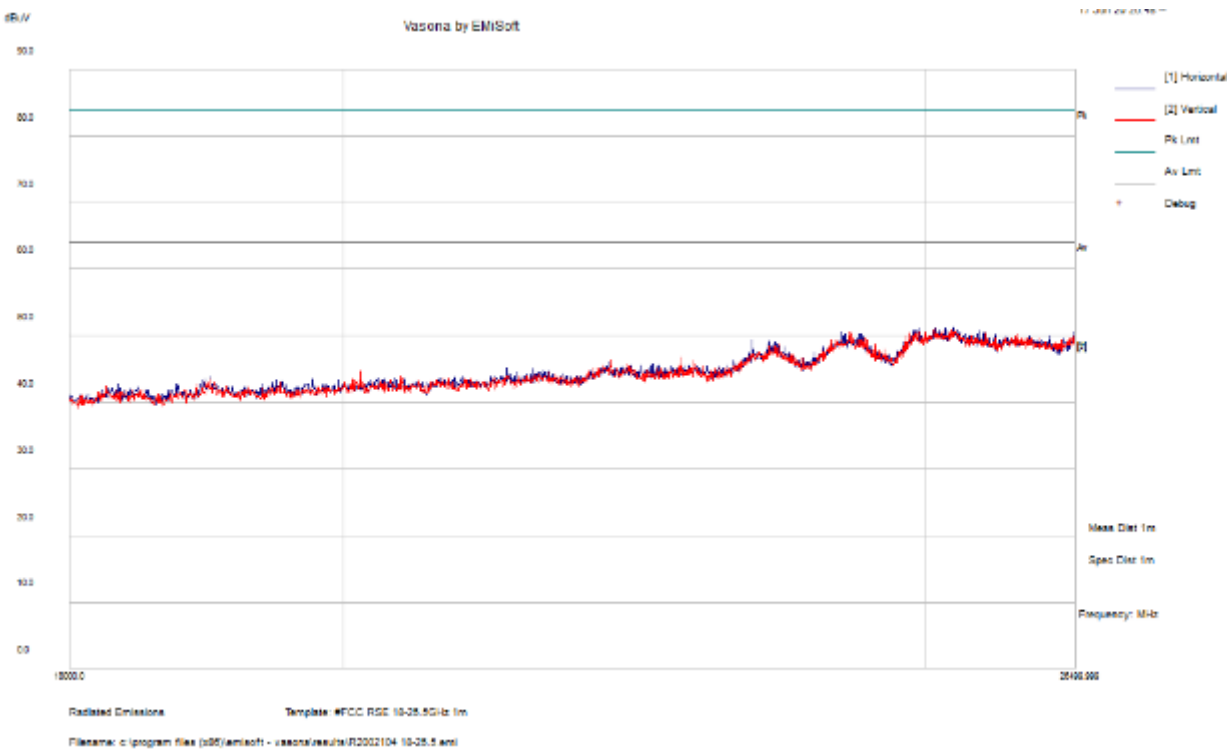
Frequency (MHz)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Comment
4960.55	63.81	204	H	71	84	-20.19	Pass
4960.55	57.11	204	H	71	64	-6.89	Pass

4) 10-18 GHz, measured at 1 meter



Frequency (MHz)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Comment
17306.6	67.41	294	V	314	84	-16.59	Pass
17306.6	56.95	294	V	314	64	-7.05	Pass

5) 18-26.5 GHz, measured at 1 meter



7 FCC §15.247(a) (2) & ISEDC RSS-247 §5.2 -Emission Bandwidth

7.1 Applicable Standards

According to ECFR §15.247(a) (2) and ISEDC RSS-247 §5.2, 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.

7.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 8: DTS bandwidth.

7.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2019-11-07	2 years
-	RF cable	-	-	Each time ¹	N/A
-	20dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

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

7.4 Test Environmental Conditions

Temperature:	24° C
Relative Humidity:	32 %
ATM Pressure:	101.3 KPa

The testing was performed by Christopher Casteel on 2020-06-17 at RF site.

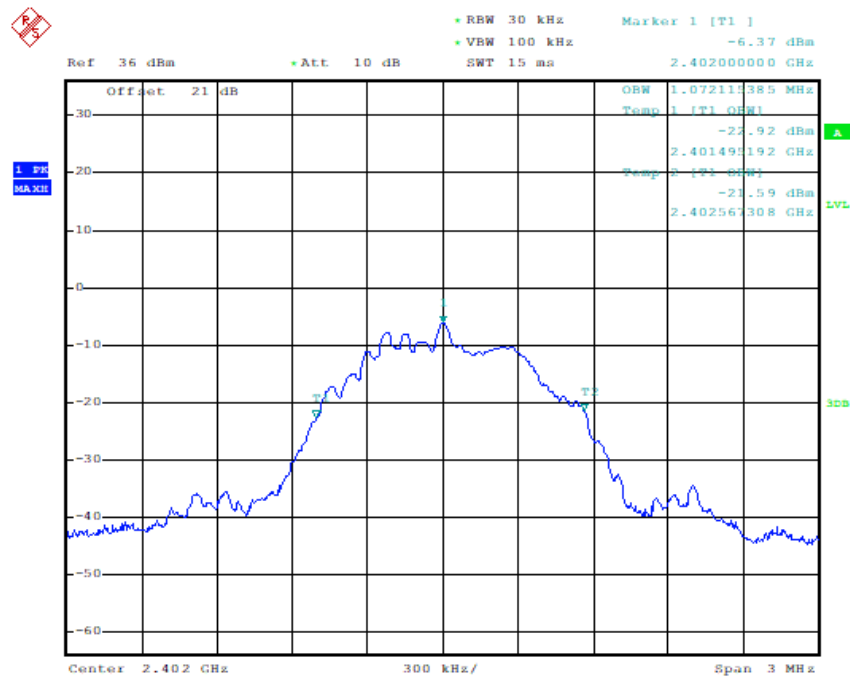
7.5 Test Results

Channel	Frequency (MHz)	99% OBW (kHz)	6 dB BW (kHz)	6 dB OBW limit (kHz)
BLE				
Low	2402	1072.1	721.154	≥ 500
Middle	2440	1057.7	721.154	≥ 500
High	2480	1057.7	711.538	≥ 500

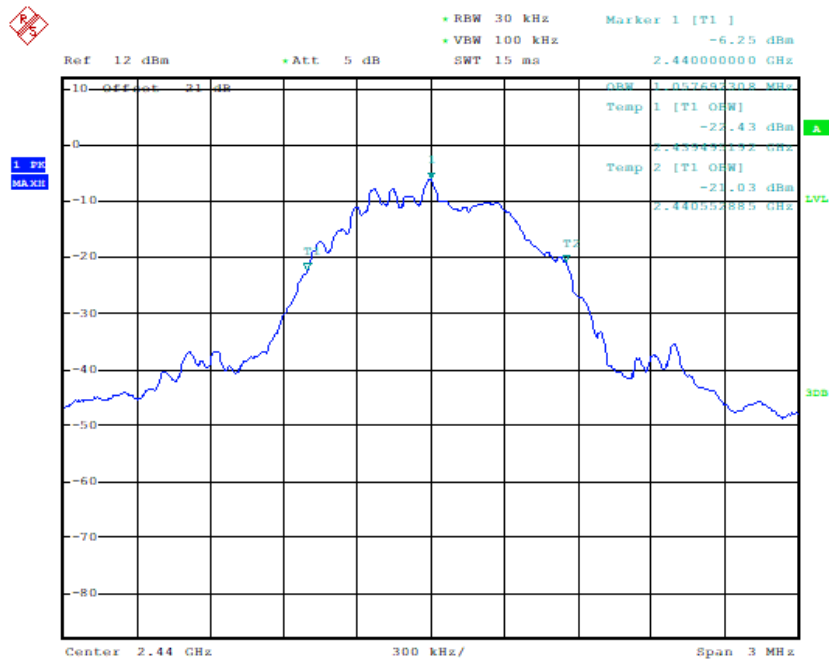
Please refer to the following plots for detailed test results.

99% OBW

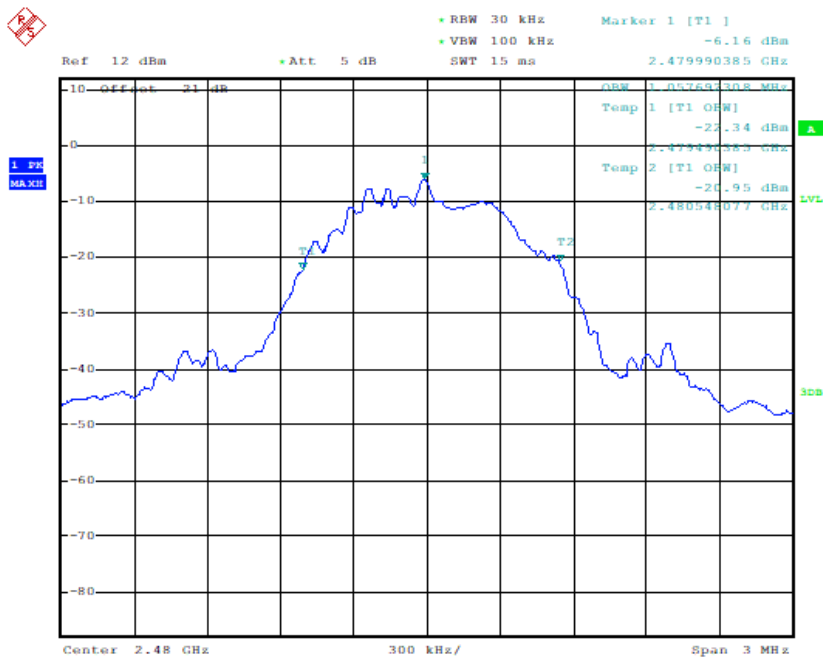
Low Channel 2402 MHz



Middle Channel 2440 MHz

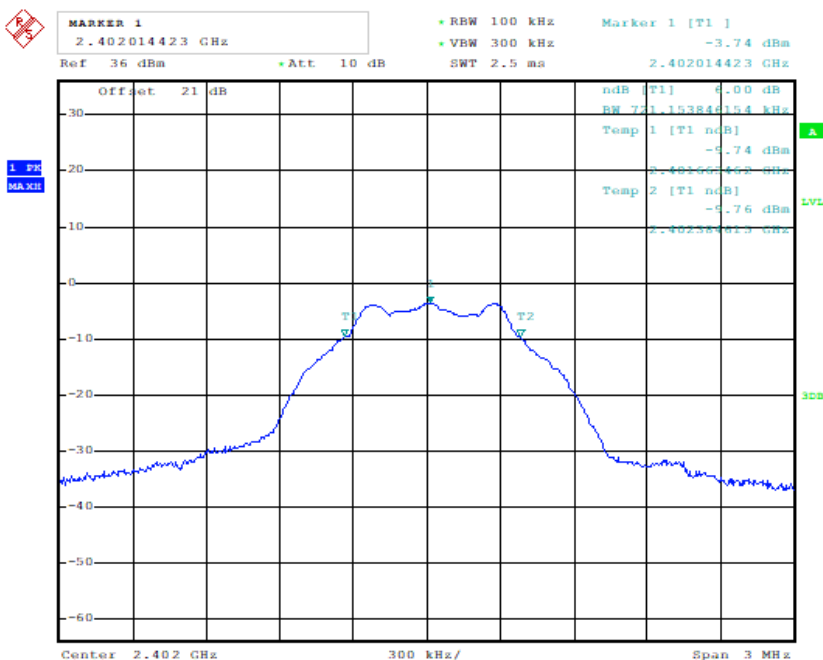


High Channel 2480 MHz

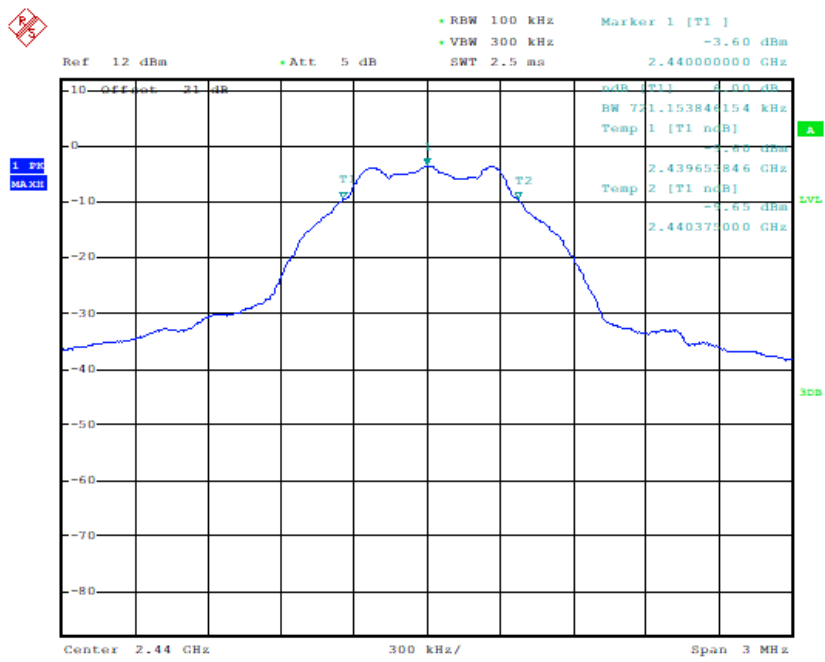


6dB OBW

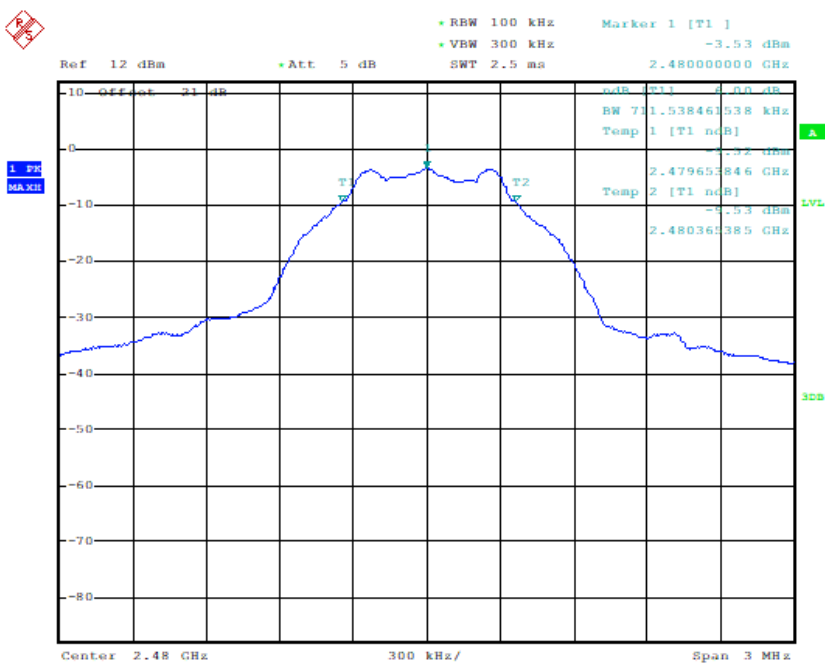
Low Channel 2402 MHz



Middle Channel 2440 MHz



High Channel 2480 MHz



8 FCC §15.247(b) (3) & ISEDC RSS-247 §5.4 (4) - Output Power Measurement

8.1 Applicable Standards

According to ECFR §15.247(b) (3) and ISEDC RSS-247 §5.4 (4) for systems using digital modulation in the 902~928 MHz, 2400~2483.5 MHz, and 5725~5850 MHz bands: 1 Watt.

8.2 Measurement Procedure

The measurements were based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 9: Fundamental emission output power.

8.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Agilent	Analyzer, Spectrum	E4440A	US45303156	2020-04-29	1 year
-	10dB attenuator	-	-	Each time ¹	N/A
-	RF Cable	-	-	Each time ¹	N/A

Note¹: cable included in the test set-up will be checked each time before testing.

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

8.4 Test Environmental Conditions

Temperature:	20° C
Relative Humidity:	32 %
ATM Pressure:	102.1 KPa

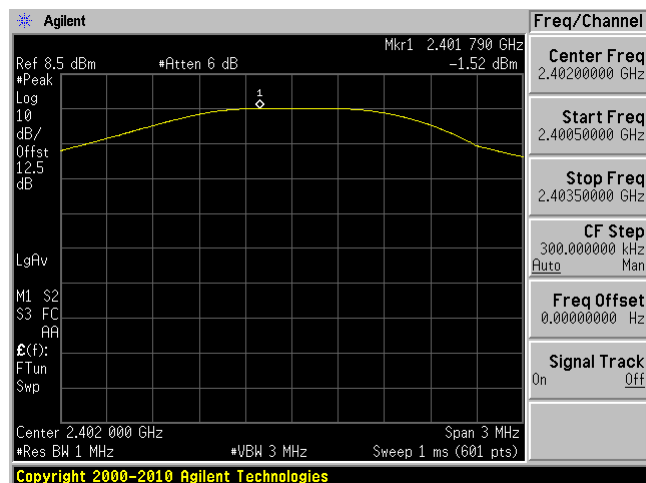
The testing was performed by Matthew Riego de Dios on 2020-06-16 at RF site.

8.5 Test Results

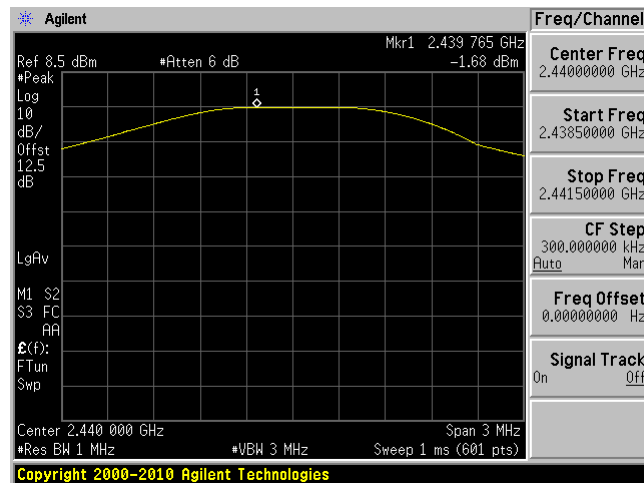
Peak Output Power

Channel	Frequency (MHz)	Conducted Peak Power (dBm)	Limit (dBm)
BLE			
Low	2402	-1.52	30
Middle	2440	-1.68	30
High	2480	-1.59	30

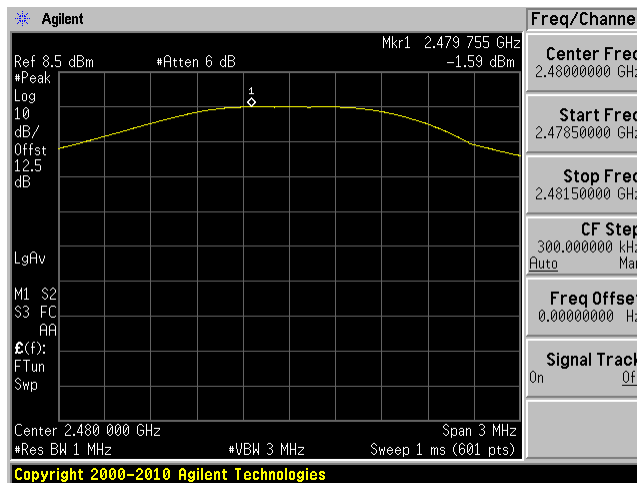
Low Channel 2402 MHz



Middle Channel 2440 MHz



High Channel 2480 MHz



9 FCC §15.247(d) and ISEDC RSS-247 §5.5 – 100 kHz Bandwidth of Band Edges

9.1 Applicable Standards

According to ECFR §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).

According to ISEDC RSS-247 §5.5. In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced 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 that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

9.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 13: Band-edge measurements.

9.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2019-11-07	2 years
-	RF cable	-	-	Each time ¹	N/A
-	20dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

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

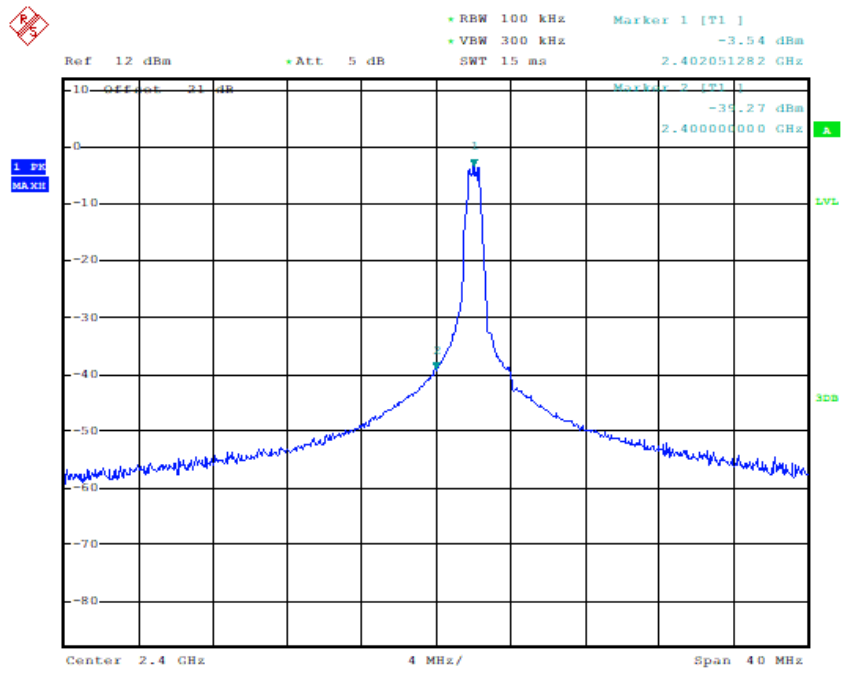
9.4 Test Environmental Conditions

Temperature:	24° C
Relative Humidity:	32 %
ATM Pressure:	101.3 KPa

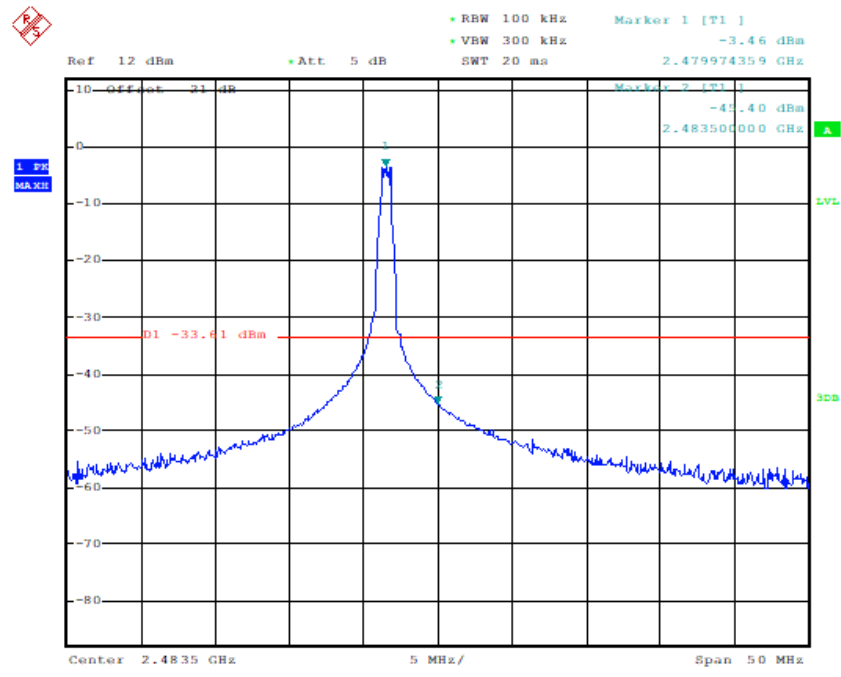
The testing was performed by Christopher Casteel on 2020-06-17 at RF site.

9.5 Test Results

Low Channel 2402 MHz



High Channel 2480 MHz



10 FCC §15.247(e) & ISEDC RSS-247 §5.2(2) – Power Spectral Density

10.1 Applicable Standards

According to ECFR §15.247(e) and RSS-247 §5.2 (2) , 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.

10.2 Measurement Procedure

The measurements were based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 10: Maximum power spectral density level in the fundamental emission.

10.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2019-11-07	2 years
-	RF cable	-	-	Each time ¹	N/A
-	20dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

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

10.4 Test Environmental Conditions

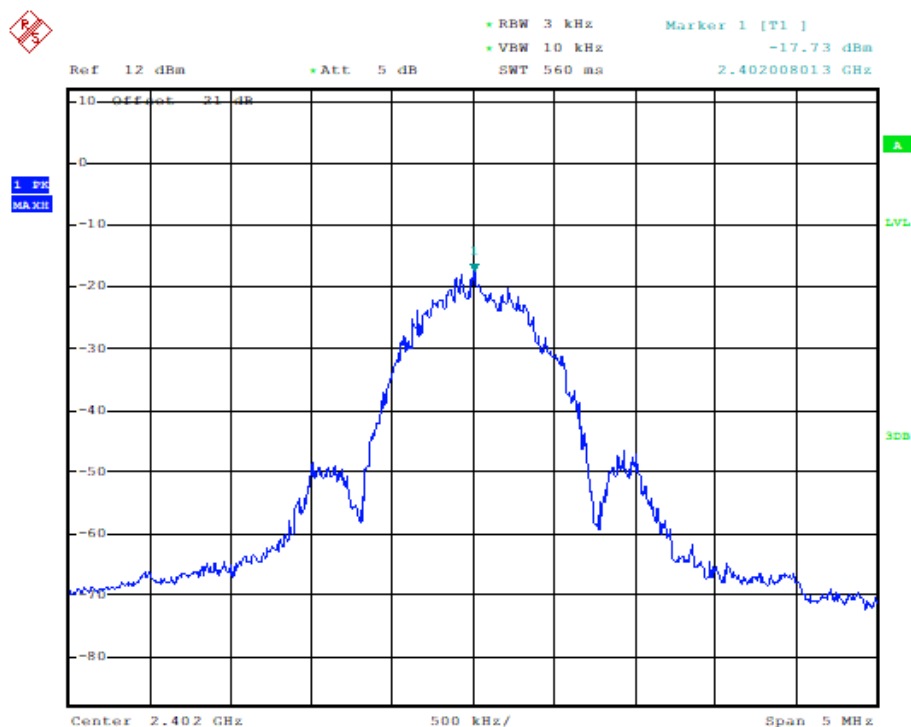
Temperature:	24° C
Relative Humidity:	32 %
ATM Pressure:	101.3 KPa

The testing was performed by Christopher Casteel on 2020-06-17 at RF site.

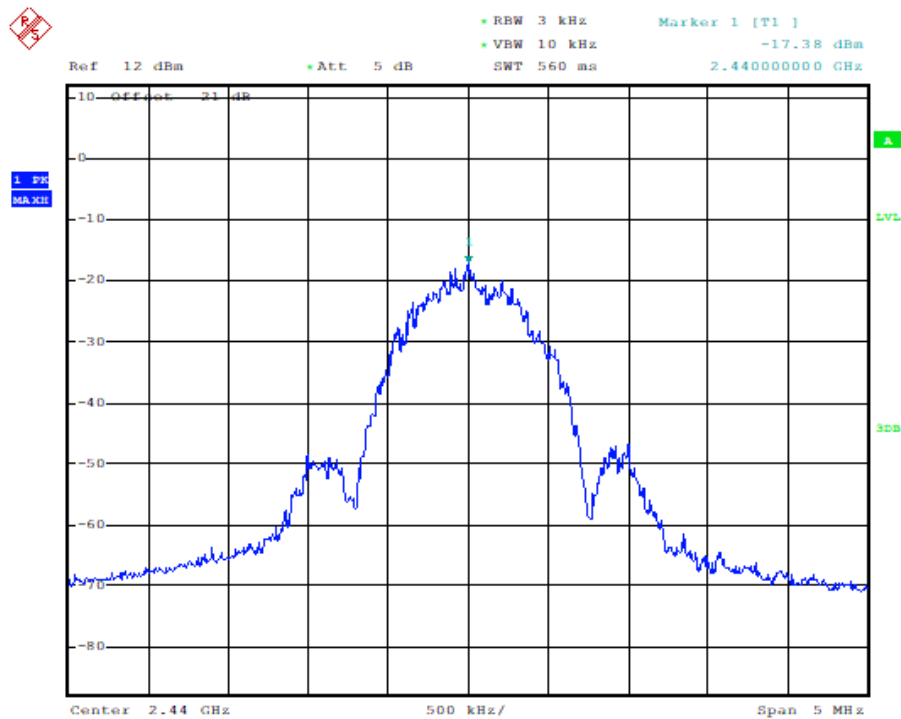
10.5 Test Results

Channel	Frequency (MHz)	PSD (dBm/3kHz)	Limit (dBm/3kHz)
BLE			
Low	2402	-17.73	8
Middle	2440	-17.38	8
High	2480	-17.47	8

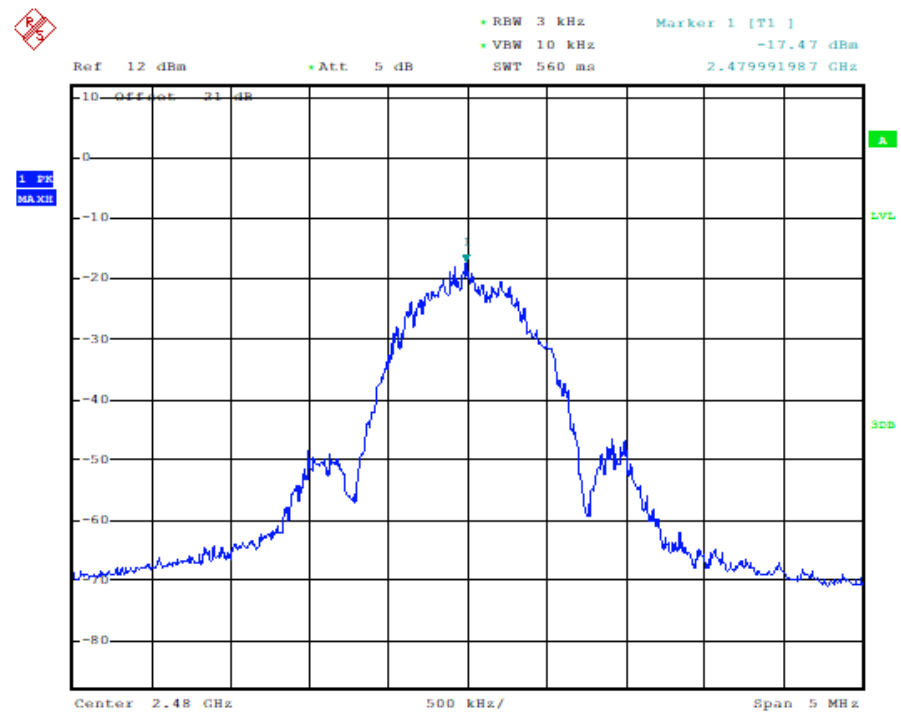
Low Channel 2402 MHz



Middle Channel 2440 MHz



High Channel 2480 MHz



11 FCC §15.247(d) & ISEDC RSS-247 §5.5, RSS-GEN §8.9 – Spurious Emissions at Antenna Terminals

11.1 Applicable Standards

For ECFR §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 §15.209(a) (see §15.205(c)).

As per ISEDC RSS-247 §5.5, in any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced 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 that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

11.2 Test 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.

11.3 Test Equipment List and Details

Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
Rohde & Schwarz	Signal Analyzer	FSQ26	200749	2019-11-07	2 years
-	RF cable	-	-	Each time ¹	N/A
-	20dB attenuator	-	-	Each time ¹	N/A

Note¹: cable and attenuator included in the test set-up will be checked each time before testing.

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

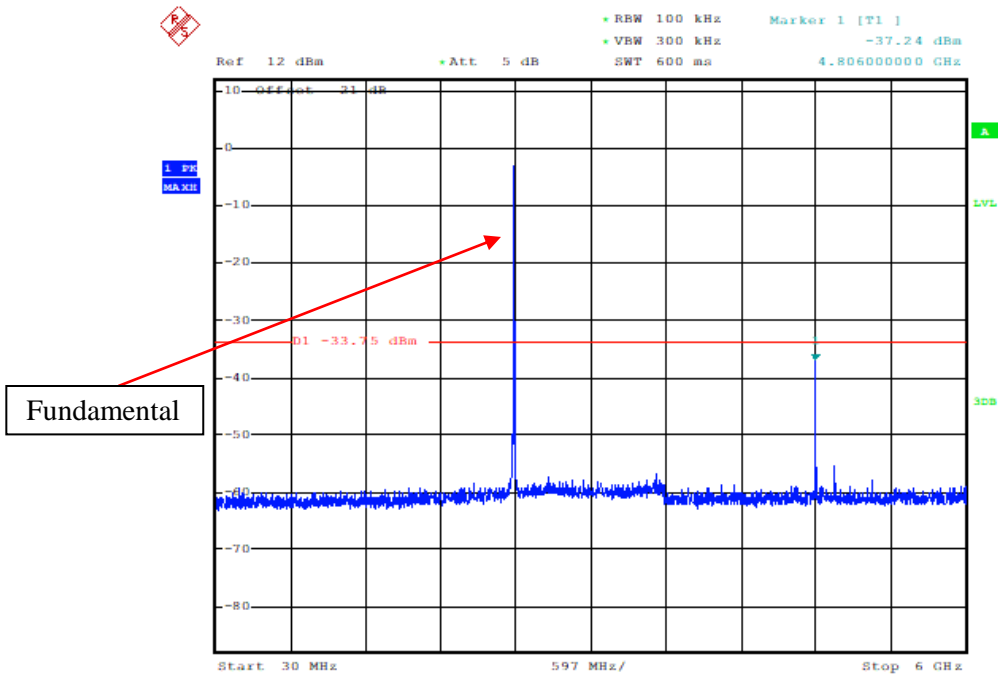
11.4 Test Environmental Conditions

Temperature:	24° C
Relative Humidity:	32 %
ATM Pressure:	101.3 KPa

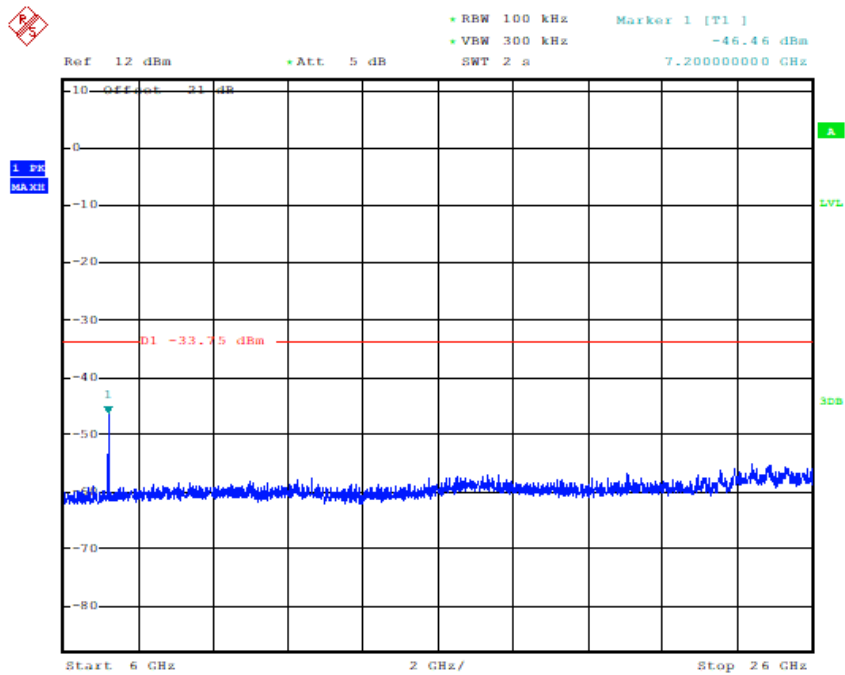
The testing was performed by Christopher Casteel on 2020-06-17 at RF site.

11.5 Test Results

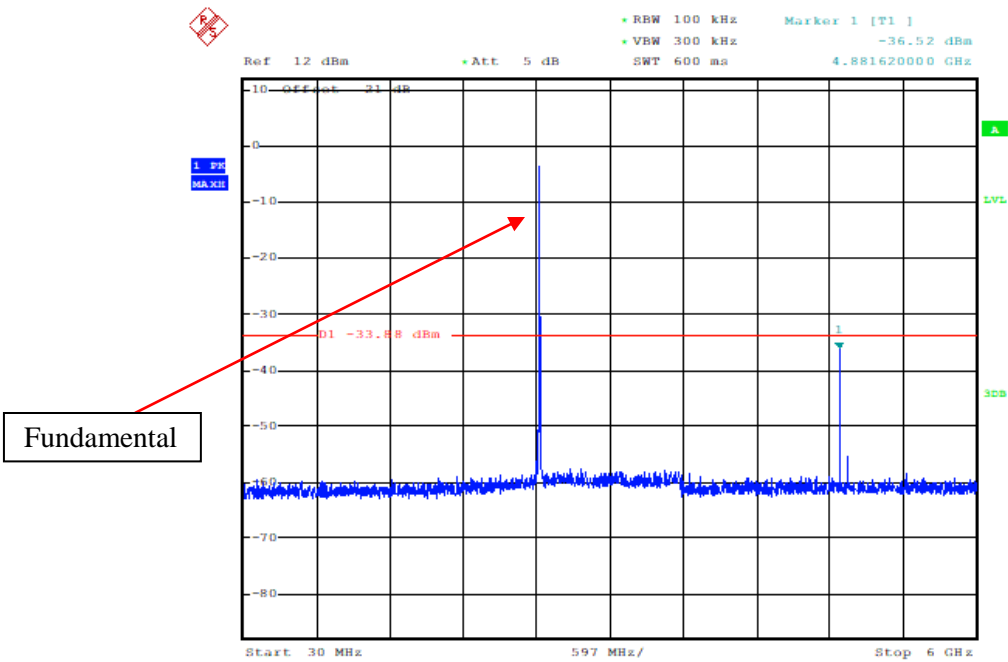
Low Channel 30 MHz – 6 GHz



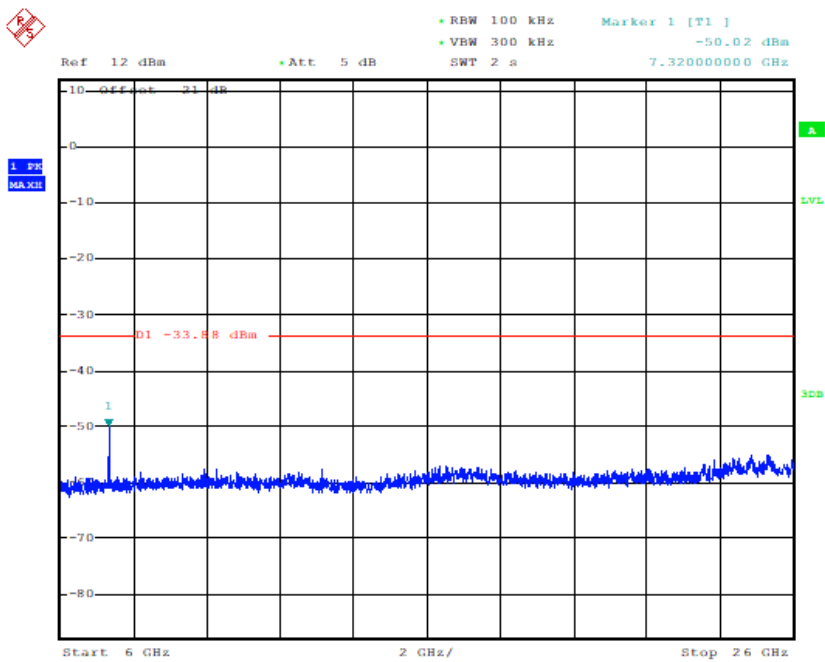
Low Channel 6 GHz – 26 GHz



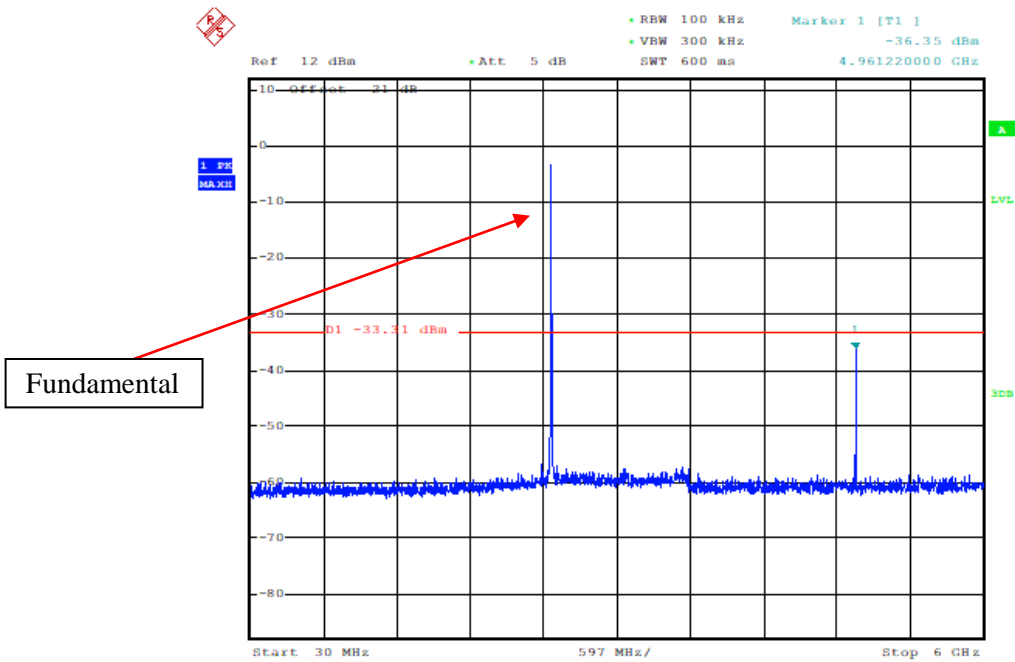
Middle Channel 30 MHz – 6 GHz



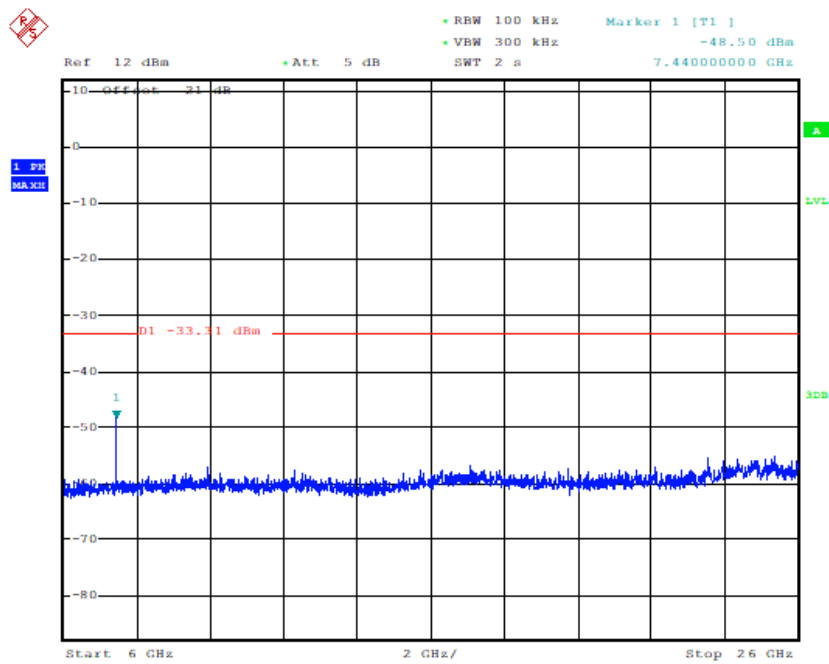
Middle Channel 6 GHz – 26 GHz



High Channel 30 MHz – 6 GHz



High Channel 6 GHz – 26 GHz



12 Annex A (Normative) – EUT Test Setup Photographs

Please refer to the attachment.

13 Annex B (Normative) – EUT External Photographs

Please refer to the attachment.

14 Annex C (Normative) – EUT Internal Photographs

Please refer to the attachment.

15 Annex D (Normative) - A2LA Electrical Testing Certificate



Please follow the web link below for a full ISO 17025 scope

<https://www.a2la.org/scopepdf/3297-02.pdf>

--- END OF REPORT ---