

# TEST REPORT

47 CFR Part 15, Subpart C 15.247

Report Reference No...... CTL2501218031-WF02

Compiled by: ( position+printed name+signature)

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Tested by: ( position+printed name+signature)

James Yu (Test Engineer)

Approved by: ( position+printed name+signature)

Ivan Xie (Manager)



Product Name..... KOMMUTER

Model/Type reference..... KOVE Kommuter

List Model(s) ..... N/A Trade Mark.....: KOVE

FCC ID...... 2BKLO-KOVEKOMMUTER

Applicant's name...... Birch Strategic Capital LLC

Test Firm...... Shenzhen CTL Testing Technology Co., Ltd.

Floor 1-A, Baisha Technology Park, No.3011, Shahexi Road, Address of Test Firm.....

Nanshan District, Shenzhen, China 518055

Test specification....:

902-928 MHz, 2400-2483.5 MHz and 5725-5850 MHz.

TRF Originator..... Shenzhen CTL Testing Technology Co., Ltd.

Master TRF.....: Dated 2011-01

Date of receipt of test item...... February 12, 2025

**Date of Test Date**...... February 12, 2025 - February 24, 2025

**Date of Issue**...... April 14, 2025

Result Pass

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# TEST REPORT

Test Report No. : CTL2501218031-WF02 April 14, 2025

Date of issue

Equipment under Test : KOMMUTER

Sample No : CTL2501218031

Model /Type : KOVE Kommuter

Listed Models : N/A

Applicant : Birch Strategic Capital LLC

Address : 31207 Ceanothus Dr, Laguna Beach, CA 92651

Manufacturer : Shenzhen Trendwoo Tech. Co., Ltd.

Address . Units 3202&3208, 32nd floor, Block C, Phase 2 Galaxy

World, Minle community, Minzhi street, Longhua

district, Shenzhen, China

Test result	Pass *

<sup>\*</sup> In the configuration tested, the EUT complied with the standards specified page 5.

The test results presented in this report relate only to the object tested.

This report shall not be reproduced, except in full, without the written approval of the issuing testing laboratory.

# \*\* Modified History \*\*

Report No.: CTL2501218031-WF02

Revisions	Description	Issued Data	Report No.	Remark
Version 1.0	Initial Test Report Release	April 14, 2025	CTL2501218031-WF02	Tracy Qi
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Table of Contents	Page
1. SUMMARY	
1.1. TEST STANDARDS	
2. GENERAL INFORMATION	
2.1. ENVIRONMENTAL CONDITIONS  2.2. GENERAL DESCRIPTION OF EUT  2.3. DESCRIPTION OF TEST MODES AND TEST FREQUENCY  2.4. EQUIPMENTS USED DURING THE TEST  2.5. RELATED SUBMITTAL(S) / GRANT (S)  2.6. MODIFICATIONS	
3. TEST CONDITIONS AND RESULTS	
3.1. CONDUCTED EMISSIONS TEST 3.2. RADIATED EMISSIONS AND BAND EDGE 3.3. MAXIMUM CONDUCTED OUTPUT POWER 3.4. POWER SPECTRAL DENSITY 3.5. 6DB BANDWIDTH 3.6. OUT-OF-BAND EMISSIONS 3.7. ANTENNA REQUIREMENT	
4. TEST SETUP PHOTOS OF THE EUT	30
5. PHOTOS OF THE FUT	30

V1.0 Page 5 of 30 Report No.: CTL2501218031-WF02

### 1. SUMMARY

### 1.1. TEST STANDARDS

The tests were performed according to following standards:

47 CFR Part 15, Subpart C 15.247 Frequency Hopping, Direct Spread Spectrum and Hybrid Systems that are in operation within the bands of 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz

ANSI C63.10: 2013: American National Standard for Testing Unlicensed Wireless Devices

KDB 558074 D01 v05r02: KDB558074 D01 15.247 Meas Guidance v05r02

# 1.2. Test Description

47 CFR Part 15, Subpart C 15.247		
47 CFR Part 15, Subpart C 15.207	AC Power Conducted Emission	PASS
47 CFR Part 15, Subpart C 15.247(a)(2)	6dB Bandwidth	PASS
47 CFR Part 15, Subpart C 15.247(d)	Spurious RF Conducted Emission	PASS
47 CFR Part 15, Subpart C 15.247(b)	Maximum Conducted Output Power	PASS
47 CFR Part 15, Subpart C 15.247(e)	Power Spectral Density	PASS
47 CFR Part 15, Subpart C 15.109/15.205/15.209	Radiated Emissions	PASS
47 CFR Part 15, Subpart C 15.247(d)	Band Edge	PASS
47 CFR Part 15, Subpart C 15.203/15.247 (b)	Antenna Requirement	PASS

V1.0 Page 6 of 30 Report No.: CTL2501218031-WF02

### 1.3. Test Facility

#### 1.3.1 Address of the test laboratory

Shenzhen CTL Testing Technology Co.,Ltd.

Floor 1-A, Baisha Technology Park, No.3011, Shahexi Road, Nanshan District, Shenzhen, China 518055

There is one 3m semi-anechoic chamber and two line conducted labs for final test. The Test Sites meet the requirements in documents ANSI C63.10 and CISPR 32/EN 55032 requirements.

#### 1.3.2 Laboratory accreditation

The test facility is recognized, certified, or accredited by the following organizations:

CNAS-Lab Code: L7497

Shenzhen CTL Testing Technology Co., Ltd. has been assessed and proved to be in compliance with CNAS-CL01 Accreditation Criteria for Testing and Calibration Laboratories (identical to ISO/IEC 17025: 2017 General Requirements) for the Competence of Testing and Calibration Laboratories.

#### A2LA-Lab Cert. No. 4343.01

Shenzhen CTL Testing Technology Co., Ltd, EMC Laboratory has been accredited by A2LA for technical competence in the field of electrical testing, and proved to be in compliance with ISO/IEC 17025: 2017 General Requirements for the Competence of Testing and Calibration Laboratories and any additional program requirements in the identified field of testing.

IC Registration No.: 9618B

**CAB identifier: CN0041** 

The 3m alternate test site of Shenzhen CTL Testing Technology Co., Ltd. EMC Laboratory has been registered by Innovation, Science and Economic Development Canada to test to Canadian radio equipment requirements with Registration No.: 9618B.

FCC-Registration No.: 399832

**Designation No.: CN1216** 

Shenzhen CTL Testing Technology Co., Ltd. EMC Laboratory has been registered and fully described in a report filed with the (FCC) Federal Communications Commission. The acceptance letter from the FCC is maintained in our files. Registration 399832.

## 1.4. Statement of the measurement uncertainty

The data and results referenced in this document are true and accurate. The reader is cautioned that there may be errors within the calibration limits of the equipment and facilities. The measurement uncertainty was calculated for all measurements listed in this test report acc. to CISPR 16 - 4 "Specification for radio disturbance and immunity measuring apparatus and methods — Part 4: Uncertainty in EMC Measurements" and is documented in the Shenzhen CTL Testing Technology Co., Ltd. quality system acc. to DIN EN ISO/IEC 17025. Furthermore, component and process variability of devices similar to that tested may result in additional deviation. The manufacturer has the sole responsibility of continued compliance of the device.

Hereafter the best measurement capability for CTL laboratory is reported:

Test	Measurement Uncertainty	Notes
Transmitter power Radiated	±2.20 dB	(1)
Radiated Emission 9kHz~30MHz	±3.66dB	(1)
Radiated Emission 30~1000MHz	±4.08dB	(1)
Radiated Emission Above 1GHz	±4.32dB	(1)
DTS Bandwidth	±1.9%	(1)
Maximum Conducted Output Power	± 1.18 dB	(1)
Maximum Power Spectral Density Level	±0.98 dB	(1)

Band-edge	±1.21dB	(1)
Unwanted Emissions In Non-restricted Freq Bands	9kHz-7GHz:±1.09dB 7GHz-26.5GHz: ±3.27dB	(1)

<sup>(1)</sup> This uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=1.96.

# 1.5 Auxiliary equipment information

Manufacturer	Description	Model	Serial Number
Jiangsu Chenyang Electronics Co., LTD	Adapter	SC-88	SA18C63608

Note: This adapter is provided by the laboratory and is only for auxiliary testing. The customer delivered the goods without an adapter.

V1.0 Page 8 of 30 Report No.: CTL2501218031-WF02

# 2. GENERAL INFORMATION

### 2.1. Environmental conditions

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

Normal Temperature:	25°C
Relative Humidity:	55 %
Air Pressure:	101 kPa

# 2.2. General Description of EUT

Product Name:	KOMMUTER
Model/Type reference:	KOVE Kommuter
Power supply:	DC 5V===0.8A from adapter or DC 3.7V from battery
Bluetooth Low Energy	
Supported type:	Bluetooth Low Energy
Modulation:	GFSK
Operation frequency:	2402MHz to 2480MHz
Channel number:	40
Channel separation:	2MHz
Antenna type:	PCB Antenna
Antenna gain:	1.08dBi

Note1: For more details, please refer to the user's manual of the EUT.

Note2: Antenna gain provided by the applicant.

V1.0 Page 9 of 30 Report No.: CTL2501218031-WF02

# 2.3. Description of Test Modes and Test Frequency

The Applicant provides communication tools software to control the EUT for staying in continuous transmitting and receiving mode for testing.

There are 40 channels provided to the EUT and Channel 00/19/39 were selected for Bluetooth Low Energy test.

### **Operation Frequency List:**

Channel	Frequency (MHz)		
00	2402		
02	2404		
03	2406		
19	2440		
37	2476		
38	2478		
39	2480		

Note: The line display in grey were the channel selected for testing

Software Version: FCC_assist1.0.4.exe			
Test Mode Power level			
BLE 1M	4		
BLE 2M	4		

# 2.4. Equipments Used during the Test

Conducted Emission						
Test Equipment	Manufacturer	Model No.	Serial No.	Previous calibration	Last Cal.	Cal.Due
EMI Test Receiver	ROHDE & SCHWARZ	ESCI	1166.5950.03	2023/05/04	2024/04/30	2025/04/29
LISN	ROHDE & SCHWARZ	ESH2-Z5	860014/010	2023/05/04	2024/04/30	2025/04/29
Limitator	ROHDE & SCHWARZ	ESH3-Z2	100408	2023/05/04	2024/04/30	2025/04/29
Software:						
Nam	ne of Software:	48	Version:			CAN
	ES-K1	S. W.	V1.71			-400

Radiated Emission						
Test Equipment	Manufacturer	Model No.	Serial No.	Previous calibration	Last Cal.	Cal.Due
Active Loop Antenna	Da Ze	ZN30900A	1	2021/05/13	2024/04/30	2025/04/29
Double cone logarithmic antenna	Schwarzbeck	VULB 9168	824	1	2023/02/13	2026/02/12
Horn Antenna	Sunol Sciences Corp.	DRH-118	A062013		2024/11/25	2027/11/24
Horn Antenna	Ocean Microwave	OBH100400	26999002	1	2024/12/21	2027/12/20
Amplifier	MRT-AP01M06	MRT	S-001	2023/05/04	2024/04/30	2025/04/29
Amplifier	Agilent	8449B	3008A02306	2023/05/04	2024/04/30	2025/04/29
Amplifier	Brief&Smart	LNA-4018	2104197	2023/05/05	2024/05/03	2025/05/02
EMI Test Receiver	ROHDE & SCHWARZ	ESCI	1166.5950.03	2023/05/04	2024/04/30	2025/04/29
Spectrum Analyzer	RS	FSP	1164.4391.38	2023/05/05	2024/05/03	2025/05/02
Software:	2.4					- C
Nar	ne of Software:	W. The		Versi	on:	W-10/
EZ_E	MC(Below 1GHz)			V1.1.	4.2	
EZ_E	MC(Above 1GHz)	11.		V1.1.	4.2	Lab !

RF Conducted									
Test Equipment	Manufacturer	Model No.	Serial No.	Previous calibration	Last Cal.	Cal.Due			
Spectrum Analyzer	Keysight	N9020A	MY53420874	2023/05/04	2024/05/01	2025/04/30			
Temperature/Humidity Meter	Ji Yu	MC501	1	2023/05/09	2024/05/04	2025/05/03			
Software:									
Name of	Software:			Vers	ion:				
TST-	-PASS		V2.0						

# 2.5. Related Submittal(s) / Grant (s)

This submittal(s) (test report) is intended to comply with Section 15.247 of the FCC Part 15, Subpart C Rules.

V1.0 Page 11 of 30 Report No.: CTL2501218031-WF02

# 2.6. Modifications

No modifications were implemented to meet testing criteria.

V1.0 Page 12 of 30 Report No.: CTL2501218031-WF02

### 3. TEST CONDITIONS AND RESULTS

#### 3.1. Conducted Emissions Test

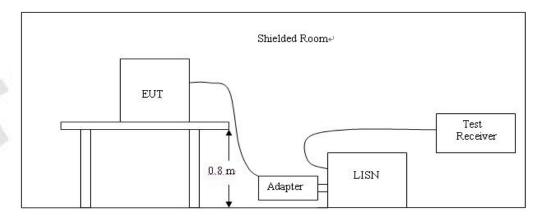
#### **LIMIT**

FCC CFR Title 47 Part 15 Subpart C Section 15.207

Fraguency range (MILIT)	Limit (c	dBuV)
Frequency range (MHz)	Quasi-peak	Average
0.15-0.5	66 to 56*	56 to 46*
0.5-5	56	46
5-30	60	50

<sup>\*</sup> Decreases with the logarithm of the frequency.

### **TEST CONFIGURATION**



#### **TEST PROCEDURE**

- 1. The equipment was set up as per the test configuration to simulate typical actual usage per the user's manual. The EUT is a tabletop system; a wooden table with a height of 0.8 meters is used and is placed on the ground plane as per ANSI C63.10:2013.
- 2. Support equipment, if needed, was placed as per ANSI C63.10:2013.
- 3. All I/O cables were positioned to simulate typical actual usage as per ANSI C63.10:2013.
- 4. The adapter received AC120V/60Hz power through a Line Impedance Stabilization Network (LISN) which supplied power source and was grounded to the ground plane.
- 5. All support equipments received AC power from a second LISN, if any.
- 6. The EUT test program was started. Emissions were measured on each current carrying line of the EUT using a spectrum Analyzer / Receiver connected to the LISN powering the EUT. The LISN has two monitoring points: Line 1 (Hot Side) and Line 2 (Neutral Side). Two scans were taken: one with Line 1 connected to Analyzer / Receiver and Line 2 connected to a 50 ohm load; the second scan had Line 1 connected to a 50 ohm load and Line 2 connected to the Analyzer / Receiver.
- 7. Analyzer / Receiver scanned from 150 kHz to 30MHz for emissions in each of the test modes.
- 8. During the above scans, the emissions were maximized by cable manipulation.

V1.0 Page 13 of 30 Report No.: CTL2501218031-WF02

#### **TEST RESULTS**

8.614500

39.90

10.5

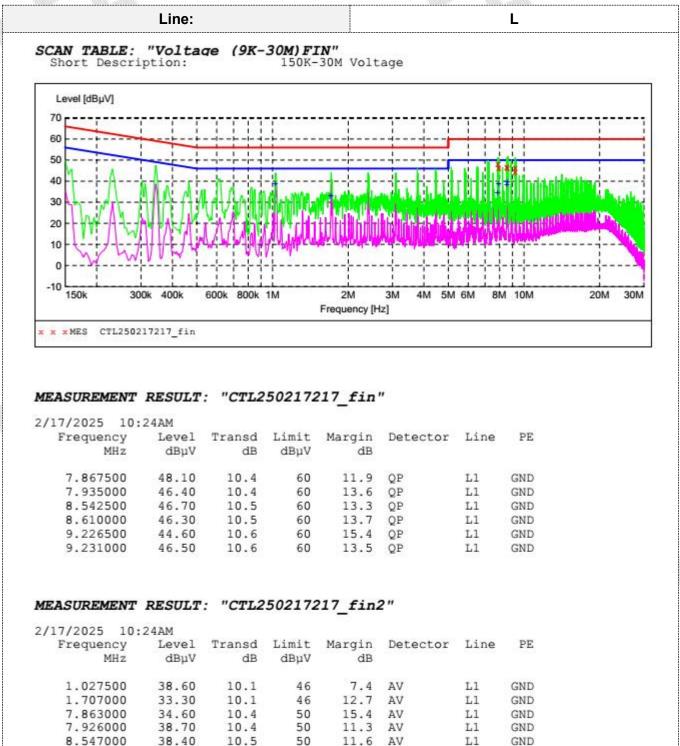
50

10.1 AV

L1

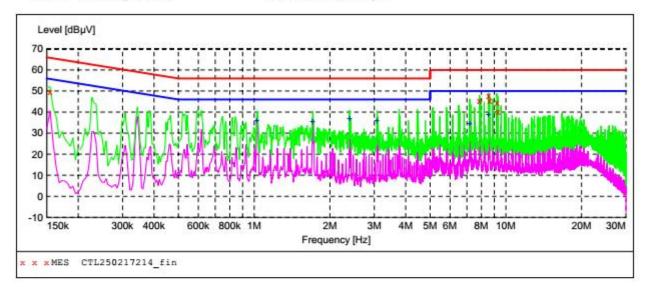
GND

Remark: All modes of BLE 1M and BLE 2M were test at Low, Middle, and High channel; only the worst result of BLE 1M Low Channel was reported as below:



#### Line: Ν

SCAN TABLE: "Voltage (9K-30M)FIN"
Short Description: 150K-30M Voltage



### MEASUREMENT RESULT: "CTL250217214 fin"

2/17/2025 10	:16AM						
Frequency MHz	Level dBµV	Transd dB	Limit dBµV	Margin dB	Detector	Line	PE
0.154500	49.80	10.0	66	16.0	QP	N	GND
7.858500	45.50	10.4	60	14.5	QP	N	GND
8.547000	47.70	10.5	60	12.3	QP	N	GND
8.619000	45.50	10.5	60	14.5	QP	N	GND
9.222000	44.40	10.6	60	15.6	QP	N	GND
9.316500	40.10	10.6	60	19.9	QP	N	GND

### MEASUREMENT RESULT: "CTL250217214\_fin2"

10:16AM						
cy Level	Transd	Limit	Margin	Detector	Line	PE
Hz dBµV	dB	dΒμV	dB			
00 36.10	10.1	46	9.9	AV	N	GND
00 35.30	10.1	46	10.7	AV	N	GND
00 36.90	10.1	46	9.1	AV	N	GND
00 35.80	10.1	46	10.2	AV	N	GND
00 34.60	10.3	50	15.4	AV	N	GND
00 38.80	10.5	50	11.2	AV	N	GND
	Cy Level Hz dBµV  00 36.10 00 35.30 00 36.90 00 35.80 00 34.60	Cy Level Transd Hz dBμV dB 00 36.10 10.1 00 35.30 10.1 00 36.90 10.1 00 35.80 10.1 00 34.60 10.3	Cy Level Transd Limit dBμV dB dBμV 00 36.10 10.1 46 00 35.30 10.1 46 00 35.80 10.1 46 00 35.80 10.1 46 00 34.60 10.3 50	Cy         Level dBμV         Transd dB dBμV         Limit dB dBμV         Margin dB           00         36.10         10.1         46         9.9           00         35.30         10.1         46         10.7           00         36.90         10.1         46         9.1           00         35.80         10.1         46         10.2           00         34.60         10.3         50         15.4	Cy Level Transd Limit Margin Detector Hz dBμV dB dBμV dB 00 36.10 10.1 46 9.9 AV 00 35.30 10.1 46 10.7 AV 00 36.90 10.1 46 9.1 AV 00 35.80 10.1 46 10.2 AV 00 34.60 10.3 50 15.4 AV	Cy         Level Transd dB

V1.0 Page 15 of 30 Report No.: CTL2501218031-WF02

# 3.2. Radiated Emissions and Band Edge

#### Limit

For intentional device, according to § 15.209(a), the general requirement of field strength of radiated emission out of authorized band shall not exceed the following table at a 3 meters measurement distance.

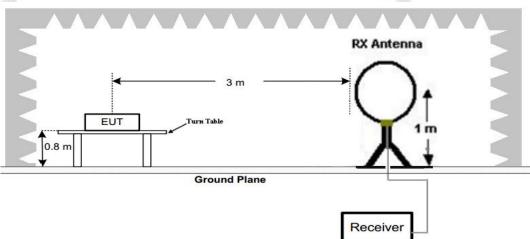
In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a)

Radiated emission limits

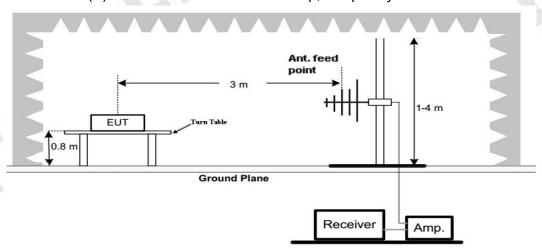
Frequency (MHz)	Distance (Meters)	Radiated (dBµV/m)	Radiated (µV/m)
0.009-0.49	3	20log(2400/F(kHz))+40log(300/3)	2400/F(kHz)
0.49-1.705	3	20log(24000/F(kHz))+ 40log(30/3)	24000/F(kHz)
1.705-30	3	20log(30)+ 40log(30/3)	30
30-88	3	40.0	100
88-216	3	43.5	150
216-960	3	46.0	200
Above 960	3	54.0	500

#### **TEST CONFIGURATION**

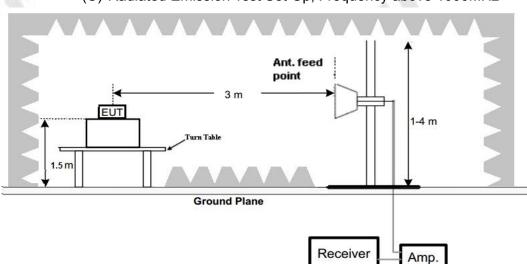
(A) Radiated Emission Test Set-Up, Frequency Below 30MHz



(B) Radiated Emission Test Set-Up, Frequency below 1000MHz



V1.0 Page 16 of 30 Report No.: CTL2501218031-WF02



#### (C) Radiated Emission Test Set-Up, Frequency above 1000MHz

#### **Test Procedure**

- 1. Below 1GHz measurement the EUT is placed on a turntable which is 0.8m above ground plane, and above 1GHz measurement EUT was placed on a low permittivity and low loss tangent turn table which is 1.5m above ground plane.
- 2. Maximum procedure was performed by raising the receiving antenna from 1m to 4m and rotating the turn table from 0°C to 360°C to acquire the highest emissions from EUT
- 3. And also, each emission was to be maximized by changing the polarization of receiving antenna both horizontal and vertical.
- 4. Repeat above procedures until all frequency measurements have been completed.
- 5. The EUT was pretested with 3 orientations placed on the table for the radiated emission measurement –X, Y, and Z-plane. The X-plane results were found as the worst case and were shown in this report.

#### **TEST RESULTS**

#### Remark:

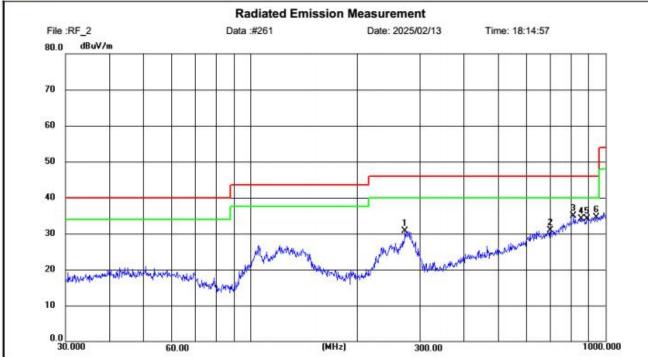
- 1. For below 1GHz testing recorded worst at Bluetooth Low Energy 2M low channel.
- For above 1GHz testing recorded worst at Bluetooth Low Energy 2M low channel.
- 3. Radiated emission test from 9 kHz to 10th harmonic of fundamental was verified, Found the emission level are attenuated 20dB below the limits from 9 kHz to 30MHz, so it does not recorded in report.

#### For 30MHz-1GHz

#### Horizontal



Shenzhen CTL Testing Technology Co., Ltd Tel: +86-755-89486194



Site LAB Chamber 2

Limit: FCC Part15 RE-Class C\_30-1000MHz

EUT: /

M/N: BS220LE

Mode: BLE2M 2402MHz

Note: Birch Strategic Capital LLC

Polarization: Horizontal Temperature: 25(C)

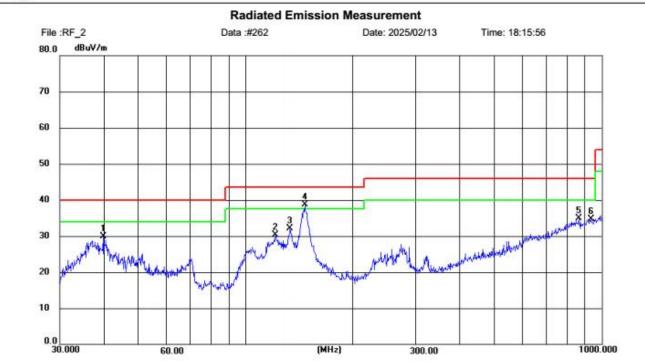
Power: Humidity: 50 % Distance: 3m

No.	Frequency (MHz)	Reading (dBuV)	Factor (dB/m)	Level (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Detector	Height (cm)	Azimuth (deg.)	P/F	Remark
1	273.1143	16.60	14.15	30.75	46.00	15.25	peak	100	110	Р	
2	699.3045	7.38	23.50	30.88	46.00	15.12	peak	100	347	Р	
3	813.1115	7.98	26.94	34.92	46.00	11.08	peak	100	55	Р	
4	855.1484	6.61	27.44	34.05	46.00	11.95	peak	100	212	Р	
5	888.3883	6.59	27.45	34.04	46.00	11.96	peak	100	336	Р	
6	942.9567	6.26	28.34	34.60	46.00	11.40	peak	100	200	Р	

#### Vertical



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Site LAB Chamber 2

Limit: FCC Part15 RE-Class C\_30-1000MHz

EUT: /

M/N: BS220LE

Mode: BLE2M 2402MHz

Note: Birch Strategic Capital LLC

Polarization: Vertical Temperature: 25(C)
Power: Humidity: 50 %

Power: Humidity: Distance: 3m

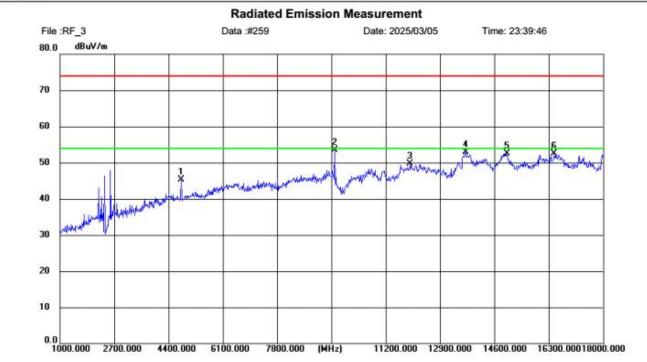
No.	Frequency (MHz)	Reading (dBuV)	Factor (dB/m)	Level (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Detector	Height (cm)	Azimuth (deg.)	P/F	Remark
1	39.8193	15.19	14.80	29.99	40.00	10.01	peak	100	351	Р	
2	121.2293	16.59	13.69	30.28	43.50	13.22	peak	100	23	Р	
3	133.6188	17.91	14.10	32.01	43.50	11.49	peak	100	23	Р	
4	146.6946	24.34	14.30	38.64	43.50	4.86	peak	100	351	Р	
5	864.9498	7.34	27.59	34.93	46.00	11.07	peak	100	216	Р	
6	933.4982	6.40	28.32	34.72	46.00	11.28	peak	100	261	Р	

#### For 1GHz to 25GHz

#### Horizontal



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Site LAB Chamber 2

Polarization: Horizontal

Temperature: 25(C)

Limit: FCC Part15 RE-Class C\_Above 1GHz\_PK

EUT: /

Power:

Distance: 3m

Humidity:

50 %

M/N: BS220LE

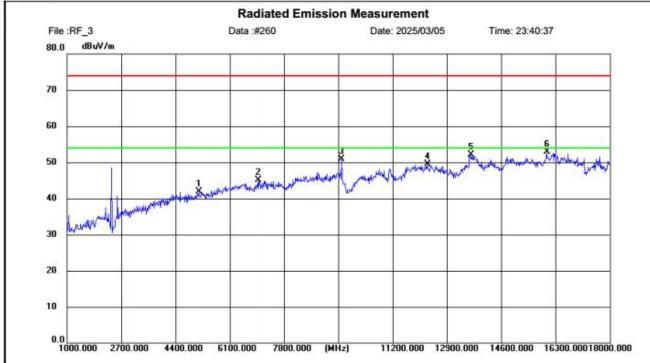
Mode: BLE2M 2402MHz TX Note: Birch Strategic Capital LLC

No.	Frequency (MHz)	Reading (dBuV)	Factor (dB/m)	Level (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Detector	Height (cm)	Azimuth (deg.)	P/F	Remark
1	4803.750	53.42	-8.09	45.33	74.00	28.67	peak	150	168	Р	
2	9608.375	53.03	0.45	53.48	74.00	20.52	peak	150	295	Р	
3	11973.500	47.62	2.12	49.74	74.00	24.26	peak	150	154	Р	
4	13703.250	48.99	3.90	52.89	74.00	21.11	peak	150	360	Р	
5	14991.000	49.13	3.32	52.45	74.00	21.55	peak	150	1	Р	
6	16484.875	46.29	6.13	52.42	74.00	21.58	peak	150	196	Р	

#### Vertical



Shenzhen CTL Testing Technology Co., Ltd Tel: +86-755-89486194



Site LAB Chamber 2 Polarization: Vertical Temperature: 25(C)

Limit: FCC Part15 RE-Class C\_Above 1GHz\_PK Power: Humidity: 50 %

EUT: / Distance: 3m

M/N: BS220LE

Mode: BLE2M 2402MHz TX Note: Birch Strategic Capital LLC

No.	Frequency (MHz)	Reading (dBuV)	Factor (dB/m)	Level (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Detector	Height (cm)	Azimuth (deg.)	P/F	Remark
1	5139.500	49.60	-7.79	41.81	74.00	32.19	peak	150	151	Р	
2	6988.250	48.98	-3.94	45.04	74.00	28.96	peak	150	333	Р	
3	9608.375	50.38	0.45	50.83	74.00	23.17	peak	150	52	Р	
4	12302.875	47.36	2.17	49.53	74.00	24.47	peak	150	221	Р	
5	13667.125	48.18	3.92	52.10	74.00	21.90	peak	150	179	Р	
6	16028.000	48.03	4.82	52.85	74.00	21.15	peak	150	206	Р	

#### **REMARKS:**

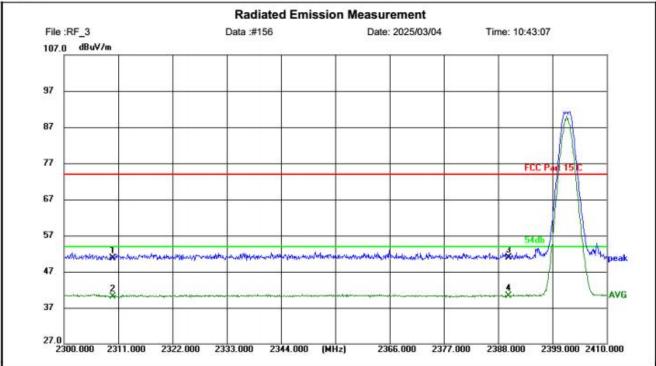
- 1. 18GHz-26GHz not recorded for no spurious point have a margin of less than 6 dB with respect to the limits.
- 2. PK detector measurement value is lower than the average limit. Therefore, there is no need to test AV detector measurements.

Results of Band Edges Test (Radiated)

CH00 Horizontal



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Site LAB Chamber 2

Limit: FCC Part 15 C

EUT: / Distance: 3m

M/N: BS220LE

Mode: BLE2M 2402MHz TX Note: Birch Strategic Capital LLC

No.	Frequency (MHz)	Reading (dBuV)	Factor (dB/m)	Level (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Detector	Height (cm)	Azimuth (deg.)	P/F	Remark
1	2310.000	41.09	9.69	50.78	74.00	23.22	peak	150	265	Р	
2	2310.000	30.49	9.69	40.18	54.00	13.82	AVG	150	265	Р	
3	2390.000	41.16	9.77	50.93	74.00	23.07	peak	150	332	Р	
4	2390.000	30.56	9.77	40.33	54.00	13.67	AVG	150	332	Р	

Power:

Polarization: Horizontal

Temperature:

Humidity:

25(C)

50 %

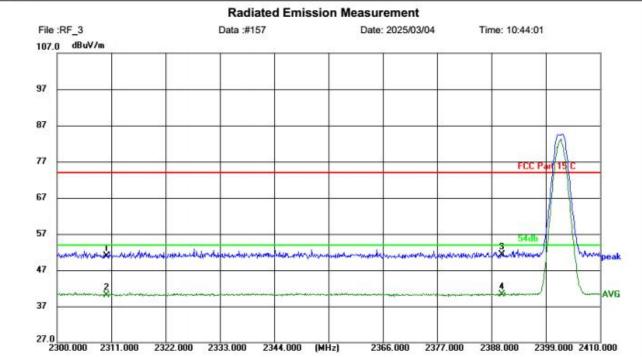
CH00

Report No.: CTL2501218031-WF02

Vertical



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Site LAB Chamber 2 Polarization: Vertical Temperature: 25(C)

Limit: FCC Part 15 C Power: Humidity: 50 %

EUT: / Distance: 3m

M/N: BS220LE

Mode: BLE2M 2402MHz TX Note: Birch Strategic Capital LLC

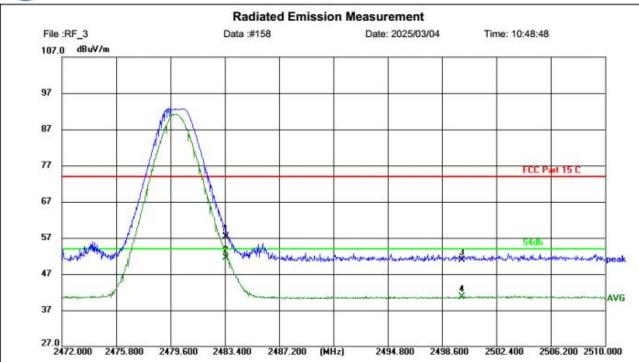
No.	Frequency (MHz)	Reading (dBuV)	Factor (dB/m)	Level (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Detector	Height (cm)	Azimuth (deg.)	P/F	Remark
1	2310.000	41.12	9.69	50.81	74.00	23.19	peak	150	116	Р	
2	2310.000	30.41	9.69	40.10	54.00	13.90	AVG	150	116	Р	
3	2390.000	41.57	9.77	51.34	74.00	22.66	peak	150	339	Р	
4	2390.000	30.55	9.77	40.32	54.00	13.68	AVG	150	339	Р	

Horizontal

**CH39** 



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Site LAB Chamber 2

Limit: FCC Part 15 C

EUT: /

M/N: BS220LE

Mode: BLE2M 2480MHz TX Note: Birch Strategic Capital LLC

Limit (dBuV/m)	Margin (dB)	Detector	Height (cm)	Azimuth (deg.)	P/F	Remark	
74.00	10.01	1-	150	210	D		

Temperature:

Humidity:

25(C)

50 %

No.	Frequency (MHz)	Reading (dBuV)	Factor (dB/m)	Level (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Detector	Height (cm)	Azimuth (deg.)	P/F	Remark
1	2483.500	47.46	9.93	57.39	74.00	16.61	peak	150	219	Р	
2	2483.500	41.56	9.93	51.49	54.00	2.51	AVG	150	219	Р	
3	2500.000	40.92	10.00	50.92	74.00	23.08	peak	150	175	Р	
4	2500.000	30.62	10.00	40.62	54.00	13.38	AVG	150	175	Р	

Power:

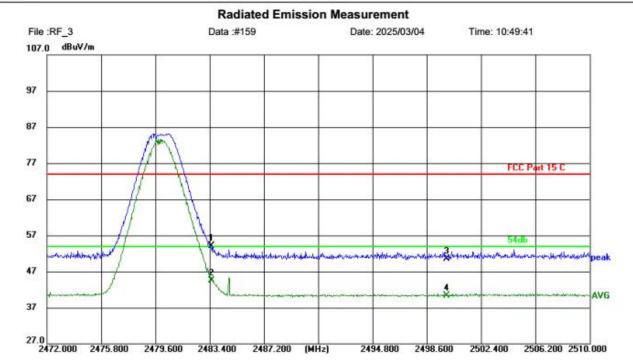
Distance: 3m

Polarization: Horizontal

CH39 Vertical



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Site LAB Chamber 2

Limit: FCC Part 15 C

EUT: /

M/N: BS220LE

Mode: BLE2M 2480MHz TX Note: Birch Strategic Capital LLC Polarization: Vertical Temperature: 25(C)

Power: Humidity: 50 %
Distance: 3m

No.	Frequency (MHz)	Reading (dBuV)	Factor (dB/m)	Level (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Detector	Height (cm)	Azimuth (deg.)	P/F	Remark
1	2483.500	44.22	9.93	54.15	74.00	19.85	peak	150	162	Р	
2	2483.500	34.55	9.93	44.48	54.00	9.52	AVG	150	162	Р	
3	2500.000	40.59	10.00	50.59	74.00	23.41	peak	150	117	Р	
4	2500.000	30.31	10.00	40.31	54.00	13.69	AVG	150	117	Р	

V1.0 Page 25 of 30 Report No.: CTL2501218031-WF02

# 3.3. Maximum Conducted Output Power

#### Limit

The Maximum Peak Output Power Measurement is 30dBm.

### **Test Procedure**

Remove the antenna from the EUT and then connect a low loss RF cable from the antenna port to the Spectrum Analyzer.

- a) Set the RBW≥DTS bandwidth.
- b) Set VBW ≥ [3×RBW].
- c) Set span ≥ [3×RBW].
- d) Sweep time = auto couple.
- e) Detector=peak.
- f) Trace mode=max hold.
- g) Allow trace to fully stabilize.
- h) Use peak marker function to determine the peak amplitude level.

#### **Test Configuration**



#### **Test Results**

Raw data reference to Section 3 of document No. CTL2501218031-WF02\_Bluetooth Low Energy\_Appendix.

V1.0 Page 26 of 30 Report No.: CTL2501218031-WF02

### 3.4. Power Spectral Density

#### Limit

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.

#### **Test Procedure**

- 1. Use this procedure when the maximum peak conducted output power in the fundamental emission is used to demonstrate compliance.
- 2. Set the RBW ≥ 3 kHz.
- 3. Set the VBW  $\geq$  3× RBW.
- 4. Set the span to 1.5 times the DTS channel bandwidth.
- 5. Detector = peak.
- 6. Sweep time = auto couple.
- 7. Trace mode = max hold.
- 8. Allow trace to fully stabilize.
- 9. Use the peak marker function to determine the maximum power level.
- 10. If measured value exceeds limit, reduce RBW (no less than 3 kHz) and repeat.
- 11. The resulting peak PSD level must be 8dBm.

#### **Test Configuration**



#### **Test Results**

Raw data reference to Section 4 of document No. CTL2501218031-WF02\_Bluetooth Low Energy\_Appendix.

V1.0 Page 27 of 30 Report No.: CTL2501218031-WF02

### 3.5. 6dB Bandwidth

#### Limit

For digital modulation systems, the minimum 6 dB bandwidth shall be at least 500 kHz

### **Test Procedure**

The transmitter output was connected to the spectrum analyzer through an attenuator. The bandwidth of the fundamental frequency was measured by spectrum analyzer with 100 kHz RBW and 300 kHz VBW. The 6dB bandwidth is defined as the total spectrum the power of which is higher than peak power minus 6dB.

#### **Test Configuration**



### **Test Results**

Raw data reference to Section 2 of document No. CTL2501218031-WF02\_Bluetooth Low Energy\_Appendix.

V1.0 Page 28 of 30 Report No.: CTL2501218031-WF02

#### 3.6. Out-of-band Emissions

#### Limit

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 con-ducted or a radiated measurement, pro-vided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter com-plies 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.

#### **Test Procedure**

Connect the transmitter output to spectrum analyzer using a low loss RF cable, and set the spectrum analyzer to RBW=100 kHz, VBW= 300 kHz, peak detector, and max hold. Measurements utilizing these setting are made of the in-band reference level, bandedge and out-of-band emissions.

#### **Test Configuration**



#### **Test Results**

Raw data reference to Section 5 of document No. CTL2501218031-WF02\_Bluetooth Low Energy\_Appendix.

V1.0 Page 29 of 30 Report No.: CTL2501218031-WF02

### 3.7. Antenna Requirement

#### **Standard Applicable**

#### For intentional device, according to FCC 47 CFR Section 15.203:

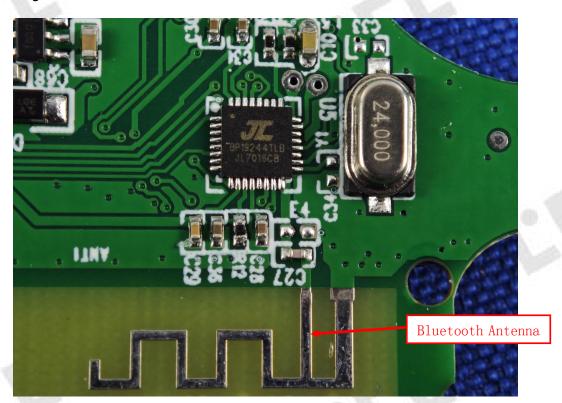
An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator, the manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited

#### FCC CFR Title 47 Part 15 Subpart C Section 15.247(b) (4):

(4) The conducted output power limit specified in paragraph (b) of this section is based on the use of antennas with directional gains that do not exceed 6 dBi. Except as shown in paragraph (c) of this section, if transmitting antennas of directional gain greater than 6 dBi are used, the conducted output power from the intentional radiator shall be reduced below the stated values in paragraphs (b)(1), (b)(2), and (b)(3) of this section, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

#### **Test Result:**

The maximum gain of antenna was 1.08dBi.



Report No.: CTL2501218031-WF02

# 4. Test Setup Photos of the EUT

Reference to the test report No.CTL2501218031-WF01.

# 5. Photos of the EUT

Reference to the test report No.CTL2501218031-WF01.