

TEST REPORT

Applicant: MonoLets, Inc
Address: 701W Evelyn Ave, Suite B, Mountain View, CA
94041 USA
Equipment Type: Bluetooth Shipping Label
Model Name: Shipping Label v5.0
Brand Name: MonoLets
FCC ID: 2BLATMLSHPLBL052503
ISED Number: 33091-SL052503
47 CFR Part 15 Subpart C
Test Standard: RSS-Gen Issue 5
RSS-247 Issue 3
(refer to section 3.1)
Sample Arrival Date: Feb. 07, 2025
Test Date: Feb. 13, 2025 - Feb. 28, 2025
Date of Issue: May 06, 2025

ISSUED BY:

Shanghai Tejet Communications Technology Co., Ltd. Testing Center

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Revision History		
Version	Issue Date	Revisions
<u>Rev. 01</u>	<u>May 06, 2025</u>	<u>Initial Issue</u>

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1 GENERAL INFORMATION

1.1 Test Laboratory

Name	Shanghai Tejet Communications Technology Co., Ltd. Testing Center
Address	1-2/F., Building 1, No.222, Xuanlan Road, Xuanqiao, Pudong New District, Shanghai, China

1.2 Test Location

Name	Shanghai Tejet Communications Technology Co., Ltd. Testing Center
Location	1-2/F., Building 1, No.222, Xuanlan Road, Xuanqiao, Pudong New District, Shanghai, China
Accreditation Certificate	The laboratory is a testing organization accredited by FCC as a accredited testing laboratory. The designation number is CN1352. The laboratory has been listed by Industry Canada to perform electromagnetic emission measurements. The recognition numbers of test site are 29671.

2 PRODUCT INFORMATION

2.1 Applicant Information

Applicant	MonoLets, Inc
Address	701W Evelyn Ave, Suite B, Mountain View, CA 94041 USA

2.2 Manufacturer Information

Manufacturer	MonoLets, Inc
Address	701W Evelyn Ave, Suite B, Mountain View, CA 94041 USA

2.3 Factory Information

Factory	MonoLets, Inc
Address	701W Evelyn Ave, Suite B, Mountain View, CA 94041 USA

2.4 General Description for Equipment under Test (EUT)

EUT Name	Bluetooth Shipping Label
Model Name Under Test	Shipping Label v5.0
Series Model Name	N/A
Description of Model name differentiation	N/A
Sample Number	SC-SH2520008-S04(conducted) SC-SH2520008-S01(radiated)
Hardware Version	5.0
Software Version	Test software
Dimensions (Approx.)	N/A
Weight (Approx.)	N/A

2.5 Technical Information

Network and Wireless connectivity	BLE:1M&2M
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The requirement for the following technical information of the EUT was tested in this report:

Modulation Technology	DTS
Modulation Type	GFSK
Transfer Rate	1 Mbps, 2 Mbps
Frequency Range	The frequency range used is 2400 MHz to 2483.5 MHz.
Number of Channel	40 (at intervals of 2 MHz) ^{Note 1}
Tested Channel	1 Mbps: 0 (2402 MHz), 19 (2440 MHz), 39 (2480 MHz) 2 Mbps: 1 (2404 MHz), 19 (2440 MHz), 38 (2478 MHz)
Antenna Type	PCB Antenna
Antenna Gain	0.5 dBi
Antenna Impedance	50Ω
Antenna System (MIMO Smart Antenna)	N/A
Note 1: 2 Mbps does not support Channel 0, Channel 12, and Channel 39.	

All channel was listed on the following table:

BLE 1M:

Channel number	Freq. (MHz)	Channel number	Freq. (MHz)	Channel number	Freq. (MHz)	Channel number	Freq. (MHz)
0	2402	10	2422	20	2442	30	2462
1	2404	11	2424	21	2444	31	2464
2	2406	12	2426	22	2446	32	2466
3	2408	13	2428	23	2448	33	2468
4	2410	14	2430	24	2450	34	2470
5	2412	15	2432	25	2452	35	2472
6	2414	16	2434	26	2454	36	2474
7	2416	17	2436	27	2456	37	2476
8	2418	18	2438	28	2458	38	2478
9	2420	19	2440	29	2460	39	2480

BLE 2M:

Channel number	Freq. (MHz)	Channel number	Freq. (MHz)	Channel number	Freq. (MHz)	Channel number	Freq. (MHz)
/	/	10	2422	20	2442	30	2462
1	2404	11	2424	21	2444	31	2464
2	2406	/	/	22	2446	32	2466
3	2408	13	2428	23	2448	33	2468
4	2410	14	2430	24	2450	34	2470
5	2412	15	2432	25	2452	35	2472
6	2414	16	2434	26	2454	36	2474
7	2416	17	2436	27	2456	37	2476
8	2418	18	2438	28	2458	38	2478
9	2420	19	2440	29	2460	/	/

3 SUMMARY OF TEST RESULTS

3.1 Test Standards

No.	Identity	Document Title
1	47 CFR Part 15 Subpart C	Intentional radiators of radio frequency equipment
2	RSS-Gen Issue 5	General Requirements for Compliance of Radio Apparatus
3	RSS-247 Issue 3	Digital Transmission Systems (DTSs), Frequency Hopping Systems(FHSs) and Licence-Exemp Local Area Network (LE-LAN) Devices
4	ANSI C63.10-2013	American National Standard for Testing Unlicensed Wireless Devices
5	KDB 558074 D01 15.247 Meas Guidance v05r02	Guidance for compliance measurements on digital transmission system, frequency hopping spread spectrum system, and hybrid system devices operating under section 15.247 of the FCC rules

3.2 Test Verdict

No.	Description	FCC Part No.	ISED Part No.	Channel	Test Result	Verdict
1	Antenna Requirement	15.203	RSS-247, 5.4 (f)	N/A	--	Pass ^{Note1}
2	Output Power	15.247(b)	RSS-247, 5.4 (d)	Low/Middle/High	ANNEX A.1	Pass
3	Occupied Bandwidth	15.247(a)	RSS-GEN, 6.7; RSS-247, 5.2 (a)	Low/Middle/High	ANNEX A.2	Pass
4	Conducted Spurious Emission	15.247(d)	RSS-247, 5.5	Low/Middle/High	ANNEX A.3	Pass
5	Band Edge(Authorized-band band-edge)	15.247(d)	RSS-247, 5.5;	Low/ High	ANNEX A.4	Pass
6	Conducted Emission	15.207	RSS-GEN, 8.8	Low/Middle/High	ANNEX A.5	Pass
7	Radiated Spurious Emission	15.209 15.247(d)	RSS-247, 5.5	Low/Middle/High	ANNEX A.6	Pass
8	Band Edge(Restricted-band band-edge)	15.209 15.247(d)	RSS-247, 5.5	Low/Middle/High	ANNEX A.7	Pass
9	Power spectral density (PSD)	15.247(e)	RSS-247, 5.2 (b)	Low/Middle/High	ANNEX A.8	Pass
10	Receiver Spurious Emissions	--	RSS-Gen, 7.4	--	N/A	N/A ^{Note2}

Note 1: The EUT has a permanently and irreplaceable attached antenna, which complies with the requirement FCC 15.203.

Note 2: Only radio communication receivers operating in stand-alone mode within the band 30-960 MHz, as well as scanner receivers, are subject to Industry Canada requirements, so this test is not applicable.

4 GENERAL TEST CONFIGURATIONS

4.1 Test Environments

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

Relative Humidity	51% to 58%	
Atmospheric Pressure	101 kPa	
Temperature	NT (Normal Temperature)	+23.0°C to +23.9°C
Working Voltage of the EUT	NV (Normal Voltage)	3.0 V

4.2 Test Equipment List

Description	Manufacturer	Model	Serial No.	Cal. Date	Cal. Due
Spectrum Analyzer	KEYSIGHT	N9020A	MY54420147	2025.02.12	2026.02.11
Spectrum Analyzer	KEYSIGHT	N9010B	MY60240977	2025.02.12	2026.02.11
Signal Generator	Anritsu	MG3710E	6262063515	2025.02.12	2026.02.11
Wideband Radio Communication Tester	R&S	CMW500	168792	2025.02.11	2026.02.10
EMI Receiver	KEYSIGHT	N9038A	MY55330122	2024.07.09	2025.07.08
Test Antenna-Loop(9 kHz-30 MHz)	SCHWARZBECK	FMZB 1519	1519-177	2024.03.11	2027.03.10
Test Antenna-Bi-Log(30 MHz-3 GHz)	SCHWARZBECK	VULB 9163	9163-1203	2024.03.11	2027.03.10
Test Antenna-Horn(1-18 GHz)	SCHWARZBECK	BBHA 9120D	9120D-2134	2024.03.11	2027.03.10
Test Antenna-Horn (18-40 GHz)	A-INFO	LB-180400-KF	J211060307	2024.03.11	2027.03.10
Anechoic Chamber	YiHeng	9m*6m*6m	EMC001	2024.04.18	2027.04.17
EMI Receiver	KEYSIGHT	N9038A	MY55330115	2025.02.12	2026.02.11
LISN	SCHWARZBECK	NSLK 8127	8127-940	2025.02.11	2026.02.10
10dB Limiter	SCHWARZBECK	VTSD 9561-F	9561-F N00409	2025.02.11	2026.02.10
Shielded Room	YiHeng	5m*4m*3.2 m	EMC006	2024.02.22	2027.02.21

4.3 Test Software List

Description	Manufacturer	Software Version	Serial No.	Applicable Test Setup
BL410R	BALUN	V2.1.1.496	N/A	The section 4.6.1
BL410E	BALUN	V21.919	N/A	The section 4.6.2&4.6.3&4.6.4&4.6.5

4.4 Decision Rule

- No Need
 Use General conformity decision rule (Consider uncertainty or not No Yes)
 Use Special Conformity Decision Rule (Consider uncertainty or not No Yes)

4.5 Measurement Uncertainty

The following measurement uncertainty levels have been estimated for tests performed on the EUT as specified in CISPR 16-4-2.

This uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2.

Parameters	Uncertainty
Occupied Channel Bandwidth	2.4 %
RF output power, conducted	0.41 dB
Power Spectral Density, conducted	1.73 dB
Unwanted Emissions, conducted	1.73 dB
All emissions, radiated	4.57 dB
Temperature	0.82 ℃
Humidity	4.1 %

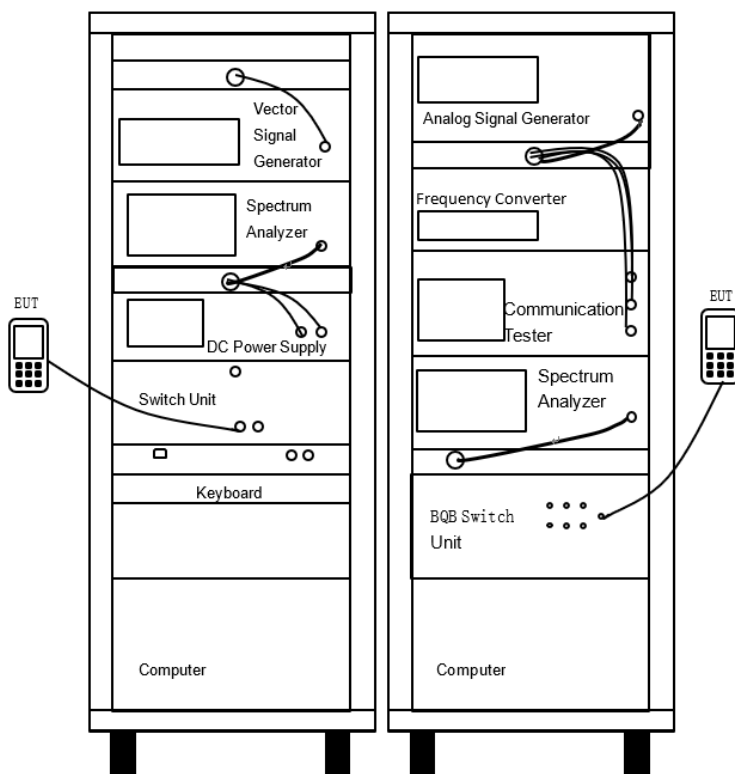
4.6 Description of Test Setup

4.6.1 For Antenna Port Test

Conducted value (dBm) = Measurement value (dBm) + cable loss (dB)

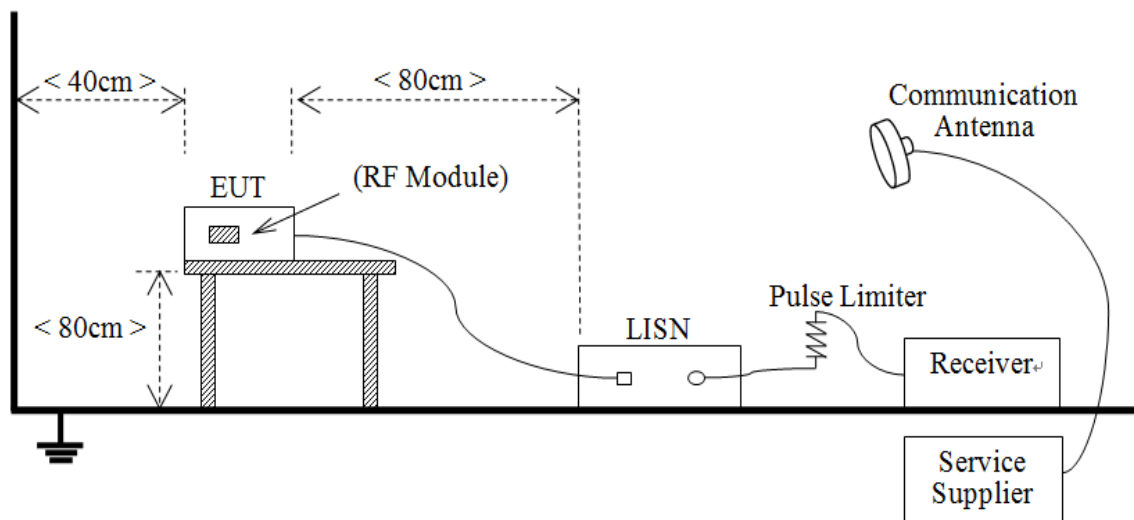
For example: the measurement value is 10 dBm and the cable 0.5 dB used, then the final result of EUT:

Conducted value (dBm) = 10 dBm + 0.5 dB = 10.5 dBm



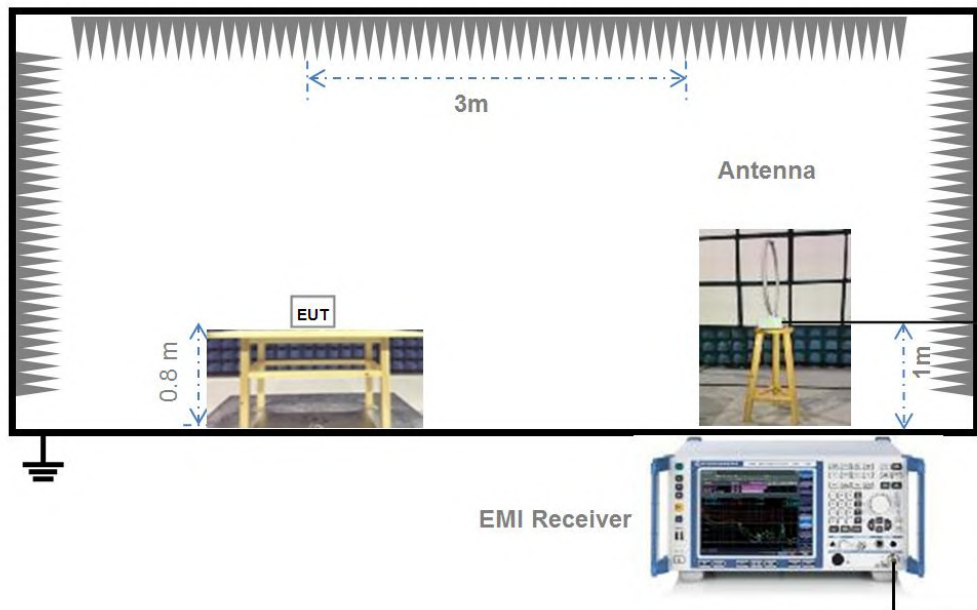
(Diagram 1)

4.6.2 For AC Power Supply Port Test



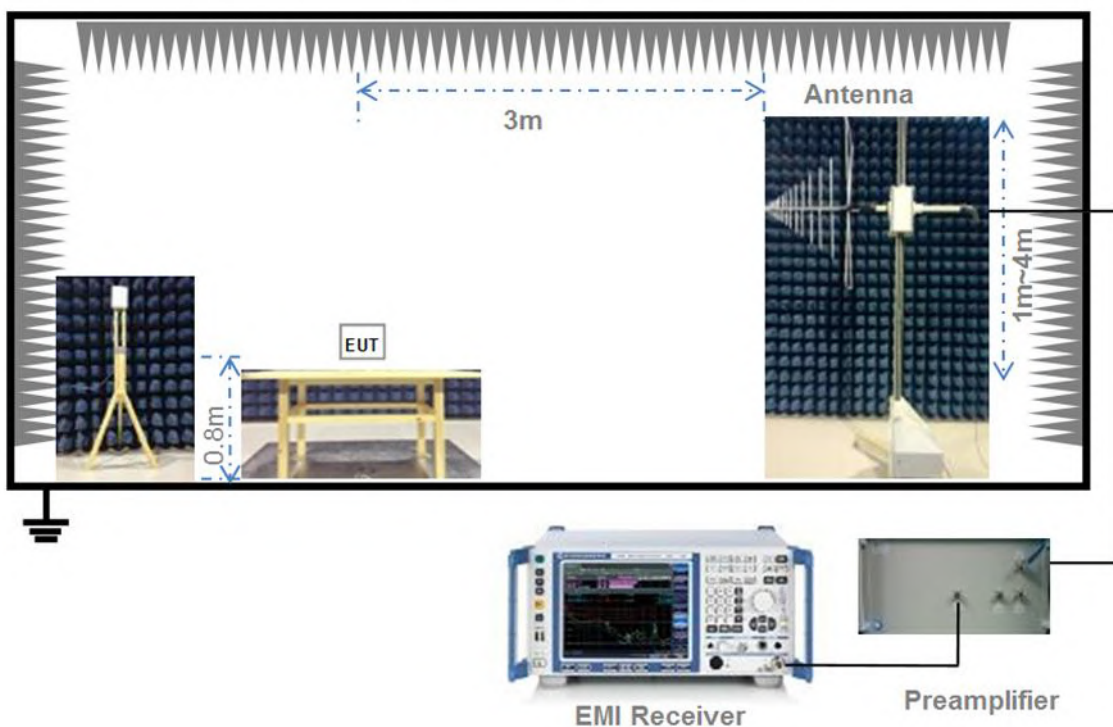
(Diagram 2)

4.6.3 For Radiated Test (Below 30 MHz)



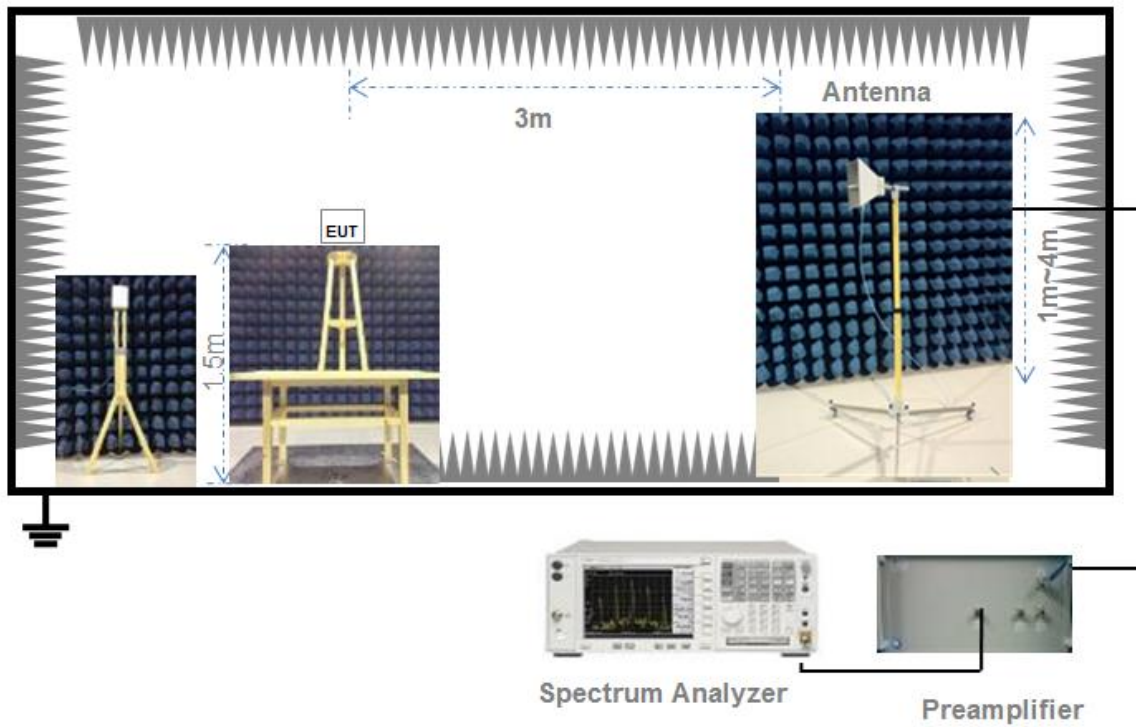
(Diagram 3)

4.6.4 For Radiated Test (30 MHz-1 GHz)



(Diagram 4)

4.6.5 For Radiated Test (Above 1 GHz)



(Diagram 5)

4.7 Measurement Results Explanation Example

4.7.1 For conducted test items:

The offset level is set in the spectrum analyzer to compensate the RF cable loss and attenuator between EUT conducted output port and spectrum analyzer. With the offset compensation, the spectrum analyzer reading level is exactly the EUT RF output level.

The spectrum analyzer offset is derived from RF cable loss and attenuator factor.

Offset = RF cable loss + attenuator factor.

4.7.2 For radiated band edges and spurious emission test:

$$E = \text{EIRP} - 20 \log D + 104.8$$

where:

E = electric field strength in dB μ V/m,

EIRP = equivalent isotropic radiated power in dBm

D = specified measurement distance in meters.

5 TEST ITEMS

5.1 Antenna Requirements

5.1.1 Relevant Standards

FCC §15.203 & 15.247(b); RSS-247, 5.4 (f)

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. This requirement does not apply to carrier current devices or to devices operated under the provisions of § 15.211, § 15.213, § 15.217, § 15.219, or § 15.221. Further, this requirement does not apply to intentional radiators that must be professionally installed, such as perimeter protection systems and some field disturbance sensors, or to other intentional radiators which, in accordance with § 15.31(d), must be measured at the installation site. However, the installer shall be responsible for ensuring that the proper antenna is employed so that the limits in this part are not exceeded.

If directional gain of transmitting antennas is greater than 6 dBi, the power shall be reduced by the same level in dB comparing to gain minus 6 dBi. For the fixed point-to-point operation, the power shall be reduced by one dB for every 3 dB that the directional gain of the antenna exceeds 6 dBi. 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 FCC rule.

5.1.2 Antenna Anti-Replacement Construction

The Antenna Anti-Replacement as following method:

Protected Method	Description
The antenna is embedded in the product.	An embedded-in antenna design is used.

Reference Documents	Item
Photo	Please refer to the EUT Photo documents.

5.1.3 Antenna Gain

The antenna peak gain of EUT is less than 6 dBi. Therefore, it is not necessary to reduce maximum peak output power limit.

5.2 Output Power

5.2.1 Test Limit

FCC § 15.247(b)

For systems using digital modulation in the 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz bands: 1 Watt. As an alternative to a peak power measurement, compliance with the one Watt limit can be based on a measurement of the maximum conducted output power. Maximum Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements.

RSS-247, 5.4 (d)

For DTSs employing digital modulation techniques operating in the bands 902-928 MHz and 2400-2483.5 MHz, the maximum peak conducted output power shall not exceed 1W. Except as provided in Section 5.4(5), the e.i.r.p. shall not exceed 4 W.

5.2.2 Test Setup

See section 4.6.1 for test setup description for the antenna port. The photo of test setup please refer to ANNEX B.

5.2.3 Test Procedure

a) Maximum peak conducted output power

This procedure shall be used when the measurement instrument has available a resolution bandwidth that is greater than the DTS bandwidth.

Set the RBW \geq DTS bandwidth.

Set VBW \geq 3 x RBW.

Set span \geq 3 x RBW

Sweep time = auto couple.

Detector = peak.

Trace mode = max hold.

Allow trace to fully stabilize.

Use peak marker function to determine the peak amplitude level.

b) Measurements of duty cycle

The zero-span mode on a spectrum analyzer or EMI receiver if the response time and spacing between bins on the sweep are sufficient to permit accurate measurements of the on and off times of the transmitted signal.

Set the center frequency of the instrument to the center frequency of the transmission.

Set RBW \geq OBW if possible; otherwise, set RBW to the largest available value.

Set VBW \geq RBW. Set detector = peak or average.

The zero-span measurement method shall not be used unless both RBW and VBW are $> 50/T$ and the number of sweep points across duration T exceeds 100. (For example, if VBW and/or RBW are limited to 3 MHz, then the zero-span method of measuring duty cycle shall not be used if $T \leq 16.7$ microseconds.)

5.2.4 Test Result

Please refer to ANNEX A.1.

5.3 Occupied Bandwidth

5.3.1 Limit

FCC §15.247(a); RSS-247, 5.2 (a); RSS-GEN, 6.7

Make the measurement with the spectrum analyzer's resolution bandwidth (RBW) = 100 kHz. In order to make an accurate measurement, set the span greater than RBW. The 6 dB bandwidth must be greater than 500 kHz.

5.3.2 Test Setup

See section 4.6.1 for test setup description for the antenna port. The photo of test setup please refer to ANNEX B.

5.3.3 Test Procedure

Use the following spectrum analyzer settings:

Set RBW = 100 kHz.

Set the video bandwidth (VBW) ≥ 3 RBW.

Detector = Peak.

Trace mode = max hold.

Sweep = auto couple.

Allow the trace to stabilize.

Measure the maximum width of the emission that is constrained by the frequencies associated with the two outermost amplitude points (upper and lower frequencies) that are attenuated by 6 dB relative to the maximum level measured in the fundamental emission.

5.3.4 Test Result

Please refer to ANNEX A.2.

5.4 Conducted Spurious Emission

5.4.1 Limit

FCC §15.247(d); RSS-247, 5.5

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.

5.4.2 Test Setup

See section 4.6.1 for test setup description for the antenna port. The photo of test setup please refer to ANNEX B.

5.4.3 Test Procedure

The DTS rules specify that in any 100 kHz bandwidth outside of the authorized frequency band, the power shall be attenuated according to the following conditions:

- a) If the maximum peak conducted output power procedure was used to demonstrate compliance as described in 9.1, then the peak output power measured in any 100 kHz bandwidth outside of the authorized frequency band shall be attenuated by at least 20 dB relative to the maximum in-band peak PSD level in 100 kHz (i.e., 20 dBc).
- b) If maximum conducted (average) output power was used to demonstrate compliance as described in 9.2, then the peak power in any 100 kHz bandwidth outside of the authorized frequency band shall be attenuated by at least 30 dB relative to the maximum in-band peak PSD level in 100 kHz (i.e., 30 dBc).
- c) In either case, attenuation to levels below the 15.209 general radiated emissions limits is not required.

The following procedures shall be used to demonstrate compliance to these limits. Note that these procedures can be used in either an antenna-port conducted or radiated test set-up. Radiated tests must conform to the test site requirements and utilize maximization procedures defined herein.

Reference level measurement:

Establish a reference level by using the following procedure:

Set instrument center frequency to DTS channel center frequency.

Set the span to ≥ 1.5 times the DTS bandwidth.

Set the RBW = 100 kHz.

Set the VBW $\geq 3 \times$ RBW.

Detector = peak.

Sweep time = auto couple.

Trace mode = max hold.

Allow trace to fully stabilize.

Use the peak marker function to determine the maximum PSD level.

Emission level measurement:

Use the following spectrum analyzer settings:

Span = wide enough to capture the peak level of the in-band emission and all spurious emissions (e.g., harmonics) from the lowest frequency generated in the EUT up through the 10th harmonic. Typically, several plots are required to cover this entire span.

Set the RBW = 100 kHz.

Set the VBW $\geq 3 \times$ RBW.

Detector = peak.

Sweep time = auto couple.

Trace mode = max hold.

Allow trace to fully stabilize.

Use the peak marker function to determine the maximum amplitude level.

Ensure that the amplitude of all unwanted emissions outside of the authorized frequency band (excluding restricted frequency bands) are attenuated by at least the minimum requirements specified in 11.1 a) or 11.1 b). Report the three highest emissions relative to the limit.

5.4.4 Test Result

Please refer to ANNEX A.3.

5.5 Band Edge (Authorized-band band-edge)

5.5.1 Limit

FCC §15.247(d); RSS-247, 5.5

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.

5.5.2 Test Setup

See section 4.6.1 for test setup description for the antenna port. The photo of test setup please refer to ANNEX B.

5.5.3 Test Procedure

The following procedures may be used to determine the peak or average field strength or power of an unwanted emission that is within 2 MHz of the authorized band edge. If a peak detector is utilized, use the procedure described in 13.2.1. Use the procedure described in 13.2.2 when using an average detector and the EUT can be configured to transmit continuously (i.e., duty cycle $\geq 98\%$). Use the procedure described in 13.2.3 when using an average detector and the EUT cannot be configured to transmit continuously but the duty cycle is constant (i.e., duty cycle variations are less than ± 2 percent). Use the procedure described in 13.2.4 when using an average detector for those cases where the EUT cannot be configured to transmit continuously and the duty cycle is not constant (duty cycle variations equal or exceed 2 percent).

When using a peak detector to measure unwanted emissions at or near the band edge (within 2 MHz of the authorized band), the following integration procedure can be used.

Set instrument center frequency to the frequency of the emission to be measured (must be within 2 MHz of the authorized band edge).

Set span to 2 MHz

RBW = 100 kHz.

VBW $\geq 3 \times$ RBW.

Detector = peak.

Sweep time = auto.

Trace mode = max hold.

Allow sweep to continue until the trace stabilizes (required measurement time may increase for low duty cycle applications)

Compute the power by integrating the spectrum over 1 MHz using the analyzer's band power measurement function with band limits set equal to the emission frequency (femission) ± 0.5 MHz. If the instrument does not have a band power function, then sum the amplitude levels (in power units) at 100 kHz intervals extending across the 1 MHz spectrum defined by femission ± 0.5 MHz.

5.5.4 Test Result

Please refer to ANNEX A.4.

5.6 Conducted Emission

5.6.1 Limit

FCC §15.207; RSS-GEN, 8.8

For an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency within the band 150 kHz to 30 MHz shall not exceed the limits in the following table, as measured using a 50 μ H/50 Ω line impedance stabilization network (LISN).

Frequency range (MHz)	Conducted Limit (dB μ V)	
	Quai-peak	Average
0.15 - 0.50	66 to 56	56 to 46
0.50 - 5	56	46
0.50 - 30	60	50

5.6.2 Test Setup

See section 4.6.2 for test setup description for the AC power supply port. The photo of test setup please refer to ANNEX B.

5.6.3 Test Procedure

The maximum conducted interference is searched using Peak (PK), if the emission levels more than the AV and QP limits, and that have narrow margins from the AV and QP limits will be re-measured with AV and QP detectors. Tests for both L phase and N phase lines of the power mains connected to the EUT are performed. Refer to recorded points and plots below.

Devices subject to Part 15 must be tested for all available U.S. voltages and frequencies (such as a nominal 120 VAC, 50/60 Hz and 240 VAC, 50/60 Hz) for which the device is capable of operation. A device rated for 50/60 Hz operation need not be tested at both frequencies provided the radiated and line conducted emissions are the same at both frequencies.

5.6.4 Test Result

Please refer to ANNEX A.5.

5.7 Radiated Spurious Emission

5.7.1 Limit

FCC §15.209&15.247(d); RSS-GEN, 8.9; RSS-247, 5.5

Radiated emission outside the frequency band attenuation below the general limits specified in FCC section 15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in FCC section 15.205(a), must also comply with the radiated emission limits specified in FCC section 15.209(a).

According to FCC section 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 ($\mu\text{V}/\text{m}$)	Measurement Distance (m)
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

Note:

1. Field Strength ($\text{dB}\mu\text{V}/\text{m}$) = $20 \cdot \log[\text{Field Strength } (\mu\text{V}/\text{m})]$.
2. In the emission tables above, the tighter limit applies at the band edges.
3. For Above 1000 MHz, the emission limit in this paragraph is based on measurement instrumentation employing an average detector, measurement using instrumentation with a peak detector function, corresponding to 20dB above the maximum permitted average limit.
4. For above 1000 MHz, limit field strength of harmonics: 54dBuV/m@3m (AV) and 74dBuV/m@3m (PK).

5.7.2 Test Setup

See section 4.6.3 to 4.6.5 for test setup description for the antenna port. The photo of test setup please refer to ANNEX B.

5.7.3 Test Procedure

Since the emission limits are specified in terms of radiated field strength levels, measurements performed to demonstrate compliance have traditionally relied on a radiated test configuration. Radiated measurements remain the principal method for demonstrating compliance to the specified limits; however antenna-port conducted measurements are also now acceptable to demonstrate compliance (see below for details). When radiated measurements are utilized, test site requirements and procedures for maximizing and measuring radiated emissions that are described in ANSI C63.10 shall be followed.

Antenna-port conducted measurements may also be used as an alternative to radiated measurements for demonstrating compliance in the restricted frequency bands. If conducted measurements are performed, then proper impedance matching must be ensured and an additional radiated test for cabinet/case spurious emissions is required.

General Procedure for conducted measurements in restricted bands:

- a) Measure the conducted output power (in dBm) using the detector specified (see guidance regarding measurement procedures for determining quasi-peak, peak, and average conducted output power, respectively).
- b) Add the maximum transmit antenna gain (in dBi) to the measured output power level to determine the EIRP level (see guidance on determining the applicable antenna gain)
- c) Add the appropriate maximum ground reflection factor to the EIRP level (6 dB for frequencies ≤ 30 MHz, 4.7 dB for frequencies between 30 MHz and 1000 MHz, inclusive and 0 dB for frequencies > 1000 MHz).
- d) For devices with multiple antenna-ports, measure the power of each individual chain and sum the EIRP of all chains in linear terms (e.g., Watts, mW).
- e) Convert the resultant EIRP level to an equivalent electric field strength using the following relationship:

$$E = \text{EIRP} - 20\log D + 104.8$$

where:

E = electric field strength in dB μ V/m,

EIRP = equivalent isotropic radiated power in dBm

D = specified measurement distance in meters.

- f) Compare the resultant electric field strength level to the applicable limit.
- g) Perform radiated spurious emission test.

Quasi-Peak measurement procedure

The specifications for measurements using the CISPR quasi-peak detector can be found in Publication 16 of the International Special Committee on Radio Frequency Interference (CISPR) of the International Electrotechnical Commission.

As an alternative to CISPR quasi-peak measurement, compliance can be demonstrated to the applicable emission limits using a peak detector.

Peak power measurement procedure:

Peak emission levels are measured by setting the instrument as follows:

- a) RBW = as specified in Table 1.
- b) VBW $\geq 3 \times$ RBW.
- c) Detector = Peak.
- d) Sweep time = auto.
- e) Trace mode = max hold.
- f) Allow sweeps to continue until the trace stabilizes. (Note that the required measurement time may be longer for low duty cycle applications).

Table 1—RBW as a function of frequency

Frequency	RBW
9-150 kHz	200-300 Hz
0.15-30 MHz	9-10 kHz
30-1000 MHz	100-120 kHz
> 1000 MHz	1 MHz

If the peak-detected amplitude can be shown to comply with the average limit, then it is not necessary to perform a separate average measurement.

Trace averaging across on and off times of the EUT transmissions followed by duty cycle correction:

If continuous transmission of the EUT (i.e., duty cycle ≥ 98 percent) cannot be achieved and the duty cycle is constant (i.e., duty cycle variations are less than ± 2 percent), then the following procedure shall be used:

- a) The EUT shall be configured to operate at the maximum achievable duty cycle.
- b) Measure the duty cycle, x , of the transmitter output signal as described in section 6.0.
- c) RBW = 1 MHz (unless otherwise specified).
- d) VBW $\geq 3 \times$ RBW.
- e) Detector = RMS, if $\text{span}/(\# \text{ of points in sweep}) \leq (\text{RBW}/2)$. Satisfying this condition may require increasing the number of points in the sweep or reducing the span. If this condition cannot be satisfied, then the detector mode shall be set to peak.
- f) Averaging type = power (i.e., RMS).
 - 1) As an alternative, the detector and averaging type may be set for linear voltage averaging.
 - 2) Some instruments require linear display mode in order to use linear voltage averaging. Log or dB averaging shall not be used.
- g) Sweep time = auto.
- h) Perform a trace average of at least 100 traces.
- i) A correction factor shall be added to the measurement results prior to comparing to the emission limit in order to compute the emission level that would have been measured had the test been performed at 100 percent duty cycle. The correction factor is computed as follows:
 - 1) If power averaging (RMS) mode was used in step f), then the applicable correction factor is $10 \log(1/x)$, where x is the duty cycle.
 - 2) If linear voltage averaging mode was used in step f), then the applicable correction factor is $20 \log(1/x)$, where x is the duty cycle.
 - 3) If a specific emission is demonstrated to be continuous (≥ 98 percent duty cycle) rather than turning on and off with the transmit cycle, then no duty cycle correction is required for that emission.

NOTE: Reduction of the measured emission amplitude levels to account for operational duty factor is not permitted. Compliance is based on emission levels occurring during transmission - not on an average across on and off times of the transmitter.

Determining the applicable transmit antenna gain:

A conducted power measurement will determine the maximum output power associated with a restricted band emission; however, in order to determine the associated EIRP level, the gain of the transmitting antenna (in dBi) must be added to the measured output power (in dBm).

Since the out-of-band characteristics of the EUT transmit antenna will often be unknown, the use of a conservative antenna gain value is necessary. Thus, when determining the EIRP based on the measured conducted power, the upper bound on antenna gain for a device with a single RF output shall be selected as the maximum in-band gain of the antenna across all operating bands, or 2 dBi, whichever is greater. However, for devices that operate in multiple frequency bands while using the same transmit antenna, the highest gain of the antenna within the operating band nearest in frequency to the restricted band emission being measured may be used in lieu of the overall highest gain when the emission is at a frequency that is within 20 percent of the nearest band edge frequency, but in no case shall a value less than 2 dBi be used.

See KDB 662911 for guidance on calculating the additional array gain term when determining the effective antenna gain for a EUT with multiple outputs occupying the same or overlapping frequency ranges in the same band.

Radiated spurious emission test:

An additional consideration when performing conducted measurements of restricted band emissions is that unwanted emissions radiating from the EUT cabinet, control circuits, power leads, or intermediate circuit elements will likely go undetected in a conducted measurement configuration. To address this concern, a radiated test shall be performed to ensure that emissions emanating from the EUT cabinet (rather than the antenna port) also comply with the applicable limits.

For these cabinet radiated spurious emission measurements the EUT transmit antenna may be replaced with a termination matching the nominal impedance of the antenna. Procedures for performing radiated measurements are specified in ANSI C63.10. All detected emissions shall comply with the applicable limits.

The measurement frequency range is from 30MHz to the 10th harmonic of the fundamental frequency. The Turn Table is actuated to turn from 0° to 360°, and both horizontal and vertical polarizations of the Test Antenna are used to find the maximum radiated power. Mid channels on all channel bandwidth verified. Only the worst RB size/offset presented.

The power of the EUT transmitting frequency should be ignored.

All Spurious Emission tests were performed in X, Y, Z axis direction. And only the worst axis test condition was recorded in this test report.

Use the following spectrum analyzer settings:

Span = wide enough to fully capture the emission being measured

RBW = 1 MHz for $f \geq 1$ GHz, 100 kHz for $f < 1$ GHz

VBW \geq RBW

Sweep = auto

Detector function = peak

Trace = max hold

5.7.4 Test Result

Please refer to ANNEX A.6.

5.8 Band Edge (Restricted-band band-edge)

5.8.1 Limit

FCC §15.209&15.247(d); RSS-GEN, 8.10; RSS-247, 5.5

Radiated emission outside the frequency band attenuation below the general limits specified in FCC section 15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in FCC section 15.205(a), must also comply with the radiated emission limits specified in FCC section 15.209(a).

5.8.2 Test Setup

See section 4.6.3 to 4.6.5 for test setup description for the antenna port. The photo of test setup please refer to ANNEX B.

5.8.3 Test Procedure

The measurement frequency range is from 9 kHz to the 10th harmonic of the fundamental frequency. The Turn Table is actuated to turn from 0° to 360°, and both horizontal and vertical polarizations of the Test Antenna are used to find the maximum radiated power. Mid channels on all channel bandwidth verified. Only the worst RB size/offset presented.

The power of the EUT transmitting frequency should be ignored.

All Spurious Emission tests were performed in X, Y, Z axis direction. And only the worst axis test condition was recorded in this test report.

Use the following spectrum analyzer settings:

Span = wide enough to fully capture the emission being measured

RBW = 1 MHz for $f \geq 1$ GHz, 100 kHz for $f < 1$ GHz

VBW \geq RBW

Sweep = auto

Detector function = peak

Trace = max hold

For measurement below 1GHz, If the emission level of the EUT measured by the peak detector is 3 dB lower than the applicable limit, the peak emission level will be reported, Otherwise, the emission measurement will be repeated using the quasi-peak detector and reported.

For transmitters operating above 1 GHz repeat the measurement with an average detector.

5.8.4 Test Result

Please refer to ANNEX A.7.

5.9 Power Spectral density (PSD)

5.9.1 Limit

FCC §15.247(e); RSS-247, 5.2 (b)

The same method of determining the conducted output power shall be used to determine the power spectral density. If a peak output power is measured, then a peak power spectral density measurement is required. If an average output power is measured, then an average power spectral density measurement should be used.

The transmitter power spectral density conducted from the transmitter to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission. This power spectral density shall be determined in accordance with the provisions of Section 5.4(4), (i.e. the power spectral density shall be determined using the same method as is used to determine the conducted output power).

5.9.2 Test Setup

See section 4.6.1 (Diagram 1) for test setup description for the antenna port. The photo of test setup please refer to ANNEX B.

5.9.3 Test Procedure

Set analyzer center frequency to DTS channel center frequency.

Set the span to 1.5 times the DTS bandwidth.

Set the RBW to: $3 \text{ kHz} \leq \text{RBW} \leq 100 \text{ kHz}$.

Set the VBW $\geq 3 \text{ RBW}$.

Detector = peak.

Sweep time = auto couple.

Trace mode = max hold.

Allow trace to fully stabilize.

Use the peak marker function to determine the maximum amplitude level within the RBW.

If measured value exceeds limit, reduce RBW (no less than 3 kHz) and repeat.

5.9.4 Test Result

Please refer to ANNEX A.8.

ANNEX A TEST RESULT

A.1 Output Power, E.I.R.P, Duty Cycle

Peak Power Test Data

Channel	Measured Output Peak Power		Limit		Verdict
	GFSK (BLE 1Mbps)		dBm	mW	
	dBm	mW			
Low	2.17	1.65	30	1000	Pass
Middle	2.32	1.70			Pass
High	2.11	1.63			Pass

Channel	Measured Output Peak Power		Limit		Verdict
	GFSK (BLE 2Mbps)		dBm	mW	
	dBm	mW			
Low	2.19	1.65	30	1000	Pass
Middle	2.27	1.69			Pass
High	1.94	1.56			Pass

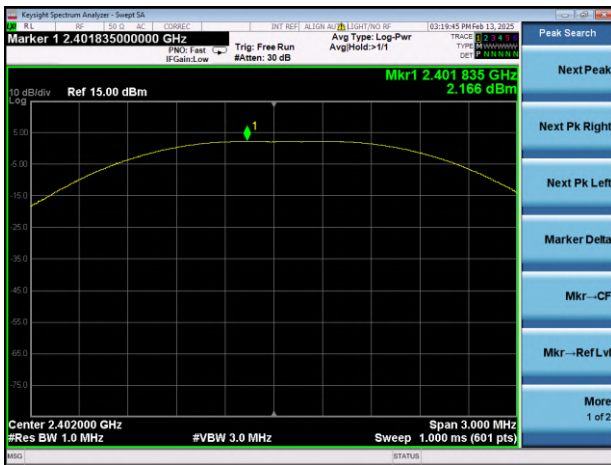
E.I.R.P Test Data (For ISED)

Channel	E.I.R.P		Limit		Verdict
	GFSK (BLE 1Mbps)		dBm	mW	
	dBm	mW			
Low	2.67	1.85	36	4000	Pass
Middle	2.82	1.91			Pass
High	2.61	1.82			Pass

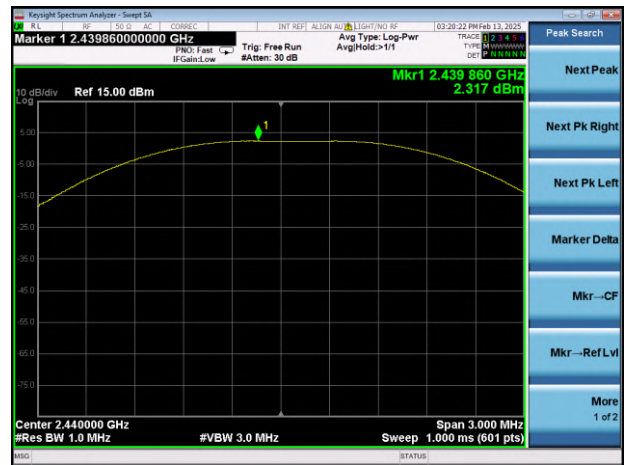
Channel	E.I.R.P		Limit		Verdict
	GFSK (BLE 2Mbps)		dBm	mW	
	dBm	mW			
Low	2.69	1.86	36	4000	Pass
Middle	2.77	1.89			Pass
High	2.44	1.76			Pass

Test Plots

GFSK (BLE 1Mbps) LOW CHANNEL



GFSK (BLE 1Mbps) MIDDLE CHANNEL

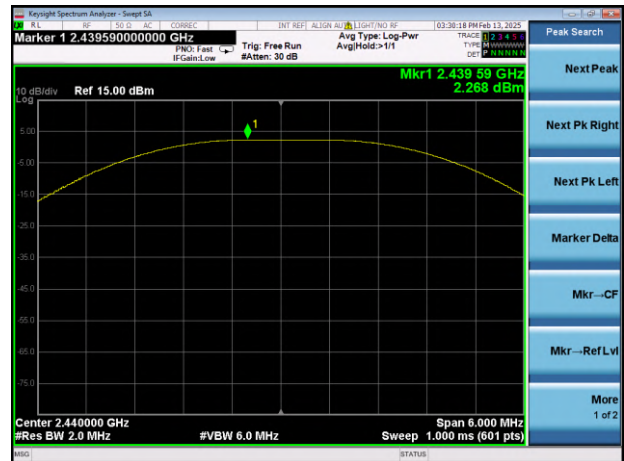
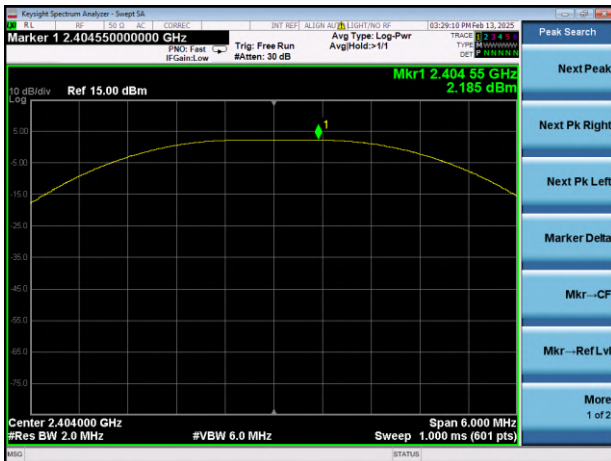


GFSK (BLE 1Mbps) HIGH CHANNEL



GFSK (BLE 2Mbps) LOW CHANNEL

GFSK (BLE 2Mbps) MIDDLE CHANNEL



GFSK (BLE 2Mbps) HIGH CHANNEL

