

**ELEMENT WASHINGTON DC LLC**

7185 Oakland Mills Road, Columbia, MD 21046 USA

Tel. 410.290.6652 / Fax 410.290.6654

<http://www.element.com>**MEASUREMENT REPORT  
FCC PART 15.225: NFC****Applicant Name:**

Microsoft Corporation  
1 Microsoft Way  
Redmond, WA 98052-8300  
United States

**Date of Testing:**

1/2/2025 - 1/31/2025

**Test Report Issue Date:**

3/19/2025

**Test Site/Location:**

Element lab., Columbia, MD, USA

**Test Report Serial No.:**

1M2501020002-13.C3K

**FCC ID:****C3K2109****APPLICANT:****Microsoft Corporation****Application Type:**

Certification

**Model:**

2109

**EUT Type:**

Portable Computing Device

**Frequency:**

13.56MHz

**FCC Classification:**

Low Power Communications Device Transmitter (DXX)

**FCC Rule Part(s):**

Part 15 Subpart C (15.225)

**Test Procedure(s):**

ANSI C63.10-2013

This equipment has been shown to be capable of compliance with the applicable technical standards as indicated in the measurement report and was tested in accordance with the measurement procedures specified in ANSI C63.10-2013. Test results reported herein relate only to the item(s) tested.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

**RJ Ortanez**  
**Executive Vice President**



<b>FCC ID:</b> C3K2109	<b>MEASUREMENT REPORT (CERTIFICATION)</b>		<b>Approved by:</b> Technical Manager
<b>Test Report S/N:</b> 1M2501020002-13.C3K	<b>Test Dates:</b> 1/2/2025 - 1/31/2025	<b>EUT Type:</b> Portable Computing Device	Page 1 of 34

© 2025 ELEMENT

V 11.1 08/28/2023

Unless otherwise specified, no part of this report may be reproduced or utilized in any part, form or by any means, electronic or mechanical, including photocopying and microfilm, without written permission from Element. If you have any questions about this or have an inquiry about obtaining additional rights to this report or assembly of contents thereof, please contact [ct.info@element.com](mailto:ct.info@element.com).

## T A B L E O F C O N T E N T S

1.0	Introduction .....	3
1.1	Scope.....	3
1.2	Element Test Location .....	3
1.3	Test Facility / Accreditations .....	3
2.0	PRODUCT INFORMATION .....	4
2.1	Equipment Description.....	4
2.2	Device Capabilities .....	4
2.3	Test Configuration .....	4
2.4	Software and Firmware.....	4
2.5	EMI Suppression Device(s)/Modifications.....	4
3.0	DESCRIPTION OF TEST .....	5
3.1	Evaluation Procedure.....	5
3.2	AC Line Conducted Emissions .....	5
3.3	Radiated Emissions .....	6
3.4	Environmental Conditions .....	6
4.0	ANTENNA REQUIREMENTS .....	7
5.0	MEASUREMENT UNCERTAINTY .....	8
6.0	TEST EQUIPMENT CALIBRATION DATA.....	9
7.0	TEST DATA .....	10
7.1	Summary .....	10
7.2	Occupied Bandwidth Measurement .....	11
7.3	Frequency Stability Test Data.....	15
7.4	In-Band Radiated Spurious Emission Measurements.....	18
7.5	Radiated Spurious Emission Measurements, Out-of-Band.....	21
7.6	Line Conducted Measurement Data .....	30
8.0	CONCLUSION .....	34

<b>FCC ID:</b> C3K2109	<b>MEASUREMENT REPORT (CERTIFICATION)</b>		<b>Approved by:</b> Technical Manager
<b>Test Report S/N:</b> 1M2501020002-13.C3K	<b>Test Dates:</b> 1/2/2025 - 1/31/2025	<b>EUT Type:</b> Portable Computing Device	Page 2 of 34

## 1.0 INTRODUCTION

### 1.1 Scope

Measurement and determination of electromagnetic emissions (EMC) of radio frequency devices including intentional and/or unintentional radiators for compliance with the technical rules and regulations of the Federal Communications Commission and the Innovation, Science and Economic Development Canada.

### 1.2 Element Test Location

These measurement tests were conducted at the Element laboratory located at 7185 Oakland Mills Road, Columbia, MD 21046. The measurement facility is compliant with the test site requirements specified in ANSI C63.4-2014.

### 1.3 Test Facility / Accreditations

**Measurements were performed at Element lab located in Columbia, MD 21046, U.S.A.**

- Element Washington DC LLC is an ISO 17025-2017 accredited test facility under the American Association for Laboratory Accreditation (A2LA) with Certificate number 2041.01 for Specific Absorption Rate (SAR), Hearing Aid Compatibility (HAC) testing, where applicable, and Electromagnetic Compatibility (EMC) testing for FCC and Innovation, Science, and Economic Development Canada rules.
- Element Washington DC LLC TCB is a Telecommunication Certification Body (TCB) accredited to ISO/IEC 17065-2012 by A2LA (Certificate number 2041.03) in all scopes of FCC Rules and ISED Standards (RSS).
- Element Washington DC LLC facility is a registered (2451B) test laboratory with the site description on file with ISED.
- Element Washington DC LLC is a Recognized U.S. Certification Assessment Body (CAB # US0110) for ISED Canada as designated by NIST under the U.S. and Canada Mutual Recognition Agreements (MRAs).

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 3 of 34

## 2.0 PRODUCT INFORMATION

### 2.1 Equipment Description

The Equipment Under Test (EUT) is the **Microsoft Portable Computing Device FCC ID: C3K2109**. The test data contained in this report pertains only to the emissions due to the NFC transmitter of the EUT in both authenticator and wireless power transfer mode.

**Test Device Serial No.:** 0F3K4CP24453Q6

### 2.2 Device Capabilities

This device contains the following capabilities:

NFC (authenticator mode and wireless power transfer mode)

### 2.3 Test Configuration

The EUT was set to continuously transmit at 13.56MHz. This was performed using manufacturer software loaded on the phone to allow for continuous transmission. This device was tested in accordance with the guidance of ANSI C63.10-2013. See Sections 3.2 and 3.3 of this test report for a description of the AC line conducted emissions and radiated emissions test setups, respectively.

The EUT contains two NFC radios, one radio is the NFC authenticator, and the other one is wireless pen charging. Both NFC radios operate at 13.56MHz. Also, the EUT supports different modulation of NFC A, B, F, and V. The worst modulation was tested and reported.

### 2.4 Software and Firmware

The test was conducted with software/firmware version 1.0.4166.1200 installed on the EUT.

### 2.5 EMI Suppression Device(s)/Modifications

No EMI suppression device(s) were added and no modifications were made during testing.

<b>FCC ID:</b> C3K2109	<b>MEASUREMENT REPORT (CERTIFICATION)</b>		<b>Approved by:</b> Technical Manager
<b>Test Report S/N:</b> 1M2501020002-13.C3K	<b>Test Dates:</b> 1/2/2025 - 1/31/2025	<b>EUT Type:</b> Portable Computing Device	Page 4 of 34

## 3.0 DESCRIPTION OF TEST

### 3.1 Evaluation Procedure

The measurement procedure described in the American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices (ANSI C63.10-2013) was used in the measurement of the EUT.

Deviation from measurement procedure.....None

### 3.2 AC Line Conducted Emissions

The line-conducted facility is located inside a 10'x16'x9' shielded enclosure. The shielded enclosure is manufactured by ETS Lindgren RF Enclosures. The shielding effectiveness of the shielded room is in accordance with MIL-Std-285 or NSA 65-5. A 1m x 1.5m wooden table 80cm high is placed 40cm away from the vertical wall and 80cm away from the sidewall of the shielded room. Two 10kHz-30MHz, 50Ω/50μH Line-Impedance Stabilization Networks (LISNs) are bonded to the shielded room floor. Power to the LISNs is filtered by external high-current high-insertion loss power line filters. The external power line filter is an ETS Lindgren Model LPRX-4X30 (100dB Attenuation, 14kHz-18GHz) and the two EMI/RFI filters are ETS Lindgren Model LRW-2030-S1 (100dB Minimum Insertion Loss, 14kHz – 10GHz). These filters attenuate ambient signal noise from entering the measurement lines. These filters are also bonded to the shielded enclosure.

The EUT is powered from one LISN and the support equipment is powered from the second LISN. If the EUT is a DC-powered device, power will be derived from the source power supply it normally will be powered from and this supply line(s) will be connected to the second LISN. All interconnecting cables more than 1 meter were shortened to a 1 meter length by non-inductive bundling (serpentine fashion) and draped over the back edge of the test table. All cables were at least 40cm above the horizontal reference groundplane. Power cables for support equipment were routed down to the second LISN while ensuring that that cables were not draped over the second LISN.

Sufficient time for the EUT, support equipment, and test equipment was allowed in order for them to warm up to their normal operating condition. The RF output of the LISN was connected to the spectrum analyzer and exploratory measurements were made to determine the frequencies producing the maximum emission from the EUT. The spectrum was scanned from 150kHz to 30MHz with a spectrum analyzer. The detector function was set to peak mode for exploratory measurements while the bandwidth of the analyzer was set to 10kHz. The EUT, support equipment, and interconnecting cables were arranged and manipulated to maximize each emission. Once the worst case emissions have been identified, the one EUT cable configuration/arrangement and mode of operation that produced these emissions is used for final measurements on the same test site. The analyzer is set to CISPR quasi-peak and average detectors with a 9kHz resolution bandwidth for final measurements.

Line conducted emissions test results are shown in Section 7.6.

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 5 of 34

### 3.3 Radiated Emissions

The radiated test facilities consisted of an indoor 3 meter semi-anechoic chamber used for final measurements and exploratory measurements, when necessary. The measurement area is contained within the semi-anechoic chamber which is shielded from any ambient interference. The test site inside the chamber is a 6m x 5.2m elliptical, obstruction-free area in accordance with Figure 5.7 of Clause 5 in ANSI C63.4-2014. Absorbers are arranged on the floor between the turn table and the antenna mast in such a way so as to maximize the reduction of reflections for measurements above 1GHz. An 80cm tall test table made of Styrodur is placed on top of the turn table. For measurements above 1GHz, an additional Styrodur pedestal is placed on top of the test table to bring the total table height to 1.5m.

For all measurements, the spectrum was scanned through all EUT azimuths and from 1 to 4 meter receive antenna height using a broadband antenna from 30MHz up to the upper frequency shown in 15.33 depending on the highest frequency generated or used in the device or on which the device operates or tunes. For frequencies above 1GHz, linearly polarized double ridge horn antennas were used. For frequencies below 30MHz, a calibrated loop antenna was used. When exploratory measurements were necessary, they were performed at 1 meter test distance inside the semi-anechoic chamber using broadband antennas, broadband amplifiers, and spectrum analyzers to determine the frequencies and modes producing the maximum emissions. Sufficient time for the EUT, support equipment, and test equipment was allowed in order for them to warm up to their normal operating condition. The test set-up was placed on top of the 1 x 1.5 meter table. The EUT, support equipment, and interconnecting cables were arranged and manipulated to maximize each emission. Appropriate precaution was taken to ensure that all emissions from the EUT were maximized and investigated. The system configuration, mode of operation, turntable azimuth, and receive antenna height was noted for each frequency found.

Final measurements were made in the semi-anechoic chamber using calibrated, linearly polarized broadband and horn antennas. The test setup was configured to the setup that produced the worst case emissions. The spectrum analyzer was set to investigate all frequencies required for testing to compare the highest radiated disturbances with respect to the specified limits. The turntable containing the EUT was rotated through 360 degrees and the height of the receive antenna was varied 1 to 4 meters and stopped at the azimuth and height producing the maximum emission. Each emission was maximized by changing the orientation of the EUT through three orthogonal planes and changing the polarity of the receive antenna, whichever produced the worst-case emissions.

### 3.4 Environmental Conditions

The temperature is controlled within range of 15°C to 35°C. The relative humidity is controlled within range of 10% to 75%. The atmospheric pressure is monitored within the range 86-106kPa (860-1060mbar).

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 6 of 34

## 4.0 ANTENNA REQUIREMENTS

### Excerpt from §15.203 of the FCC Rules/Regulations:

“An intentional radiator antenna shall be designed to ensure that no antenna other than that furnished by the responsible party can 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 antenna of the EUT are **permanently attached**.
- This unit was tested with its standard battery.

### Conclusion:

The EUT complies with the requirement of §15.203.

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 7 of 34

## 5.0 MEASUREMENT UNCERTAINTY

The measurement uncertainties shown below were calculated in accordance with the requirements of ANSI C63.10-2013. All measurement uncertainty values are shown with a coverage factor of  $k = 2$  to indicate a 95% level of confidence. The measurement uncertainty shown below meets or exceeds the  $U_{\text{CISPR}}$  measurement uncertainty values specified in CISPR 16-4-2 and, thus, can be compared directly to specified limits to determine compliance.

Contribution	Expanded Uncertainty ( $\pm$ dB)
Line Conducted Disturbance	3.09
Radiated Disturbance (<1GHz)	4.98

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 8 of 34



## 6.0 TEST EQUIPMENT CALIBRATION DATA

Test Equipment Calibration is traceable to the National Institute of Standards and Technology (NIST). Measurements antennas used during testing were calibrated in accordance to the requirements of ANSI C63.5-2017.

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
-	NMLC-2	Line Conducted Emissions Cable	4/2/2024	Annual	4/2/2025	NMLC-2
-	WL40-1	Conducted Cable Set (40GHz)	4/2/2024	Annual	4/2/2025	WL25-1
-	AP2-001	EMC Cable and Switch System	4/2/2024	Annual	4/2/2025	AP2-001
-	AP2-002	EMC Cable and Switch System	4/2/2024	Annual	4/2/2025	AP2-002
Agilent	N9020A	MXA Signal Analyzer	6/14/2024	Annual	6/14/2025	MY56470202
Rohde & Schwarz	ESU26	EMI Test Receiver (26.5GHz)	10/16/2024	Annual	10/16/2025	100342
Rohde & Schwarz	ENV216	Two-Line V-Network	1/31/2023	Biennial	1/31/2025	101379
Keysight Technologies	N9038A	MXE EMI Receiver	9/16/2024	Annual	9/16/2025	MY51210133
Rohde & Schwarz	HFH2Z2E	9kHz - 30MHz Loop Antenna	4/30/2024	Annual	4/30/2025	100546

**Table 6-1. Annual Test Equipment Calibration Schedule**

**Note:**

For equipment listed above that has a calibration date or calibration due date that falls within the test date range, care was taken to ensure that this equipment was used after the calibration date and before the calibration due date.

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 9 of 34

## 7.0 TEST DATA

### 7.1 Summary

Company Name: Microsoft Corporation  
 FCC ID: C3K2109  
 FCC Classification: Low Power Communications Device Transmitter (DXX)  
 Frequencies Examined: 13.56MHz

FCC Part Section(s)	RSS Section(s)	Test Description	Test Limit	Test Condition	Test Result	Reference
2.1049	RSS-Gen [6.6]	Occupied Bandwidth	N/A	RADIATED	PASS	Section 7.2
15.225 (a)(b)(c)	RSS-210 [B.6]	In-Band Emissions	15,848µV/m @ 30m 13.553 – 13.567 MHz  334µV/m @ 30m 13.410 – 13.553 MHz 13.567 – 13.710 MHz  106µV/m @ 30m 13.110 – 13.410 MHz 13.710 – 14.010 MHz		PASS	Section 7.4
15.225 (d) 15.209	RSS-Gen [8.9]	Out-of-Band Emissions	Emissions outside of the specified band (13.110 – 14.010 MHz) must meet the radiated limits detailed in 15.209 (RSS-Gen [8.9])		PASS	Section 7.5
15.225 (e)	RSS-210 [B.6]	Frequency Stability Tolerance	± 0.01% of Operating Frequency	Temperature Chamber	PASS	Section 7.3
15.207	RSS-Gen [8.8]	AC Conducted Emissions 150kHz – 30MHz	< FCC 15.207 limits (RSS-Gen)	LINE CONDUCTED	PASS	Section 7.6

**Table 7-1. Summary of Test Results**

**Note:**

This unit was tested with its standard battery.

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 10 of 34

## 7.2 Occupied Bandwidth Measurement

§2.1049; RSS-Gen (6.6)

### Test Overview and Limit

The occupied bandwidth is measured with a spectrum analyzer connected to the receive antenna while the EUT is operating in transmission mode at the appropriate frequency.

### Test Procedure Used

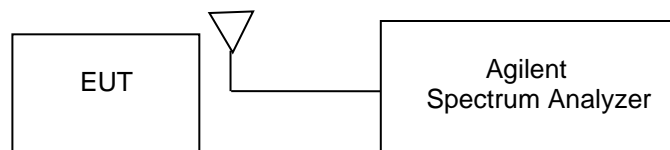
ANSI C63.10-2013 – Section 6.9.3

### Test Settings

1. Spectrum analyzer frequency is set to the nominal EUT channel center frequency.
2. RBW = 1 – 5% OBW
3. VBW  $\geq 3 \times$  RBW
4. Reference level set to keep signal from exceeding maximum input mixer level for linear operation.
5. Detector = Peak
6. Trace mode = max hold
7. Sweep = auto couple
8. The trace was allowed to stabilize
9. Using the 99% power bandwidth function of the instrument and report the measured bandwidth.

### Test Notes

None.

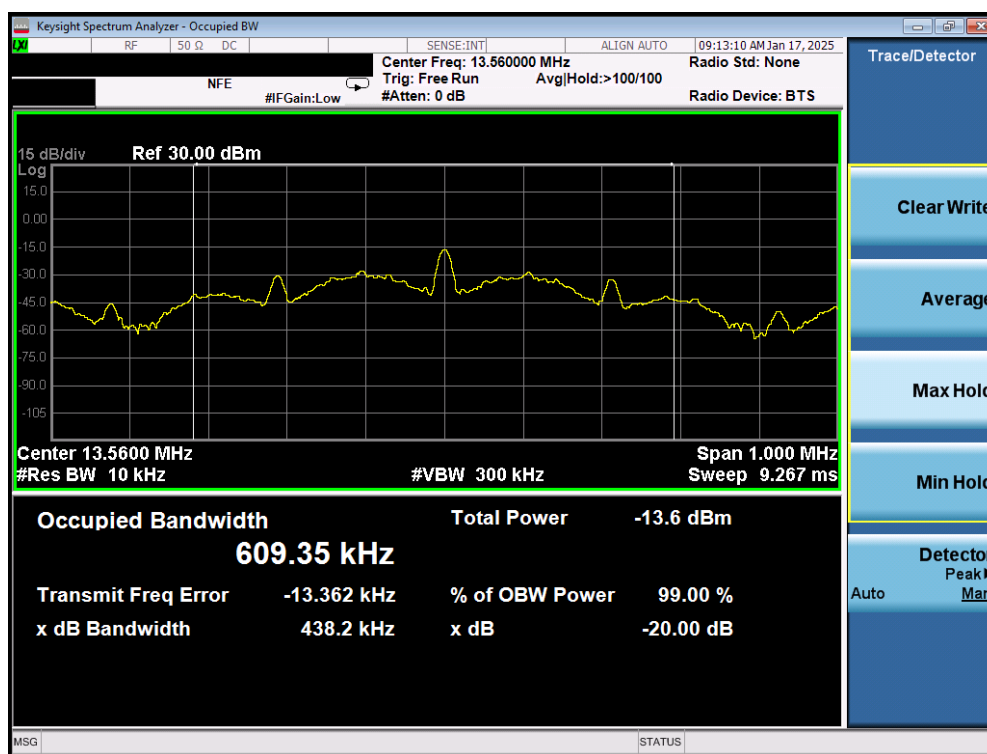


**Figure 7-1. Test Instrument & Measurement Setup**

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 11 of 34

Frequency	Occupied Bandwidth
13.56MHz – NFC A	609.35kHz
13.56MHz – NFC B	311.64kHz
13.56MHz – NFC F	897.99kHz
13.56MHz – NFC V	396.53kHz
13.56MHz – Pen Charging	630.29kHz

**Table 7-2. Occupied Bandwidth Measurement**



**Figure 7-2. Occupied Bandwidth Plot – NFC A**

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 12 of 34

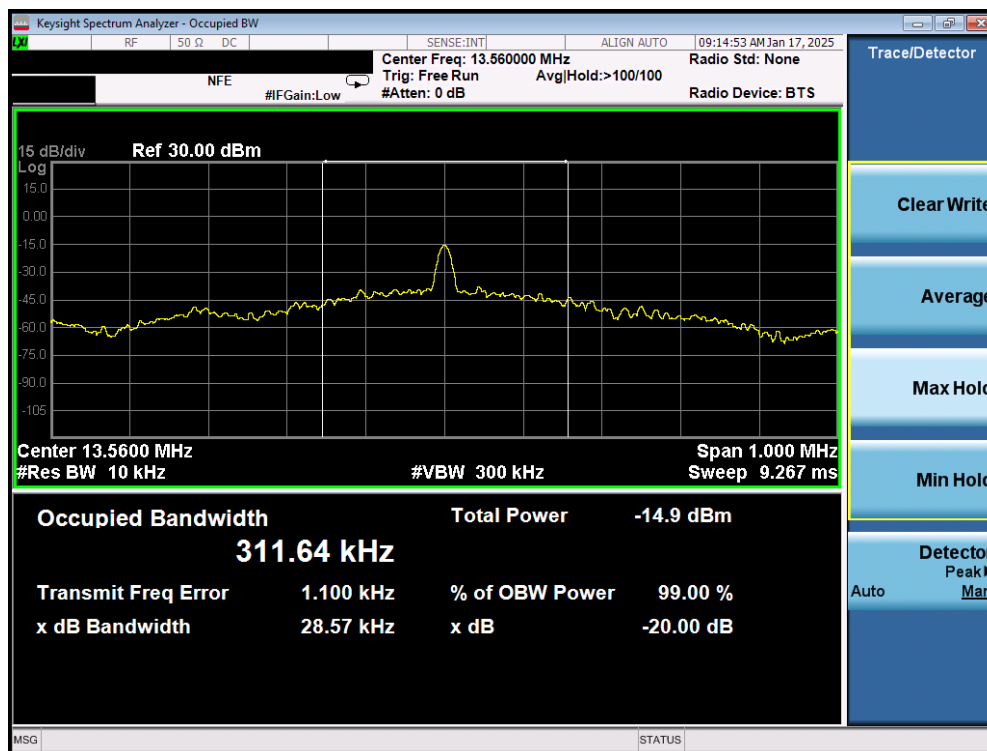


Figure 7-3. Occupied Bandwidth Plot – NFC B

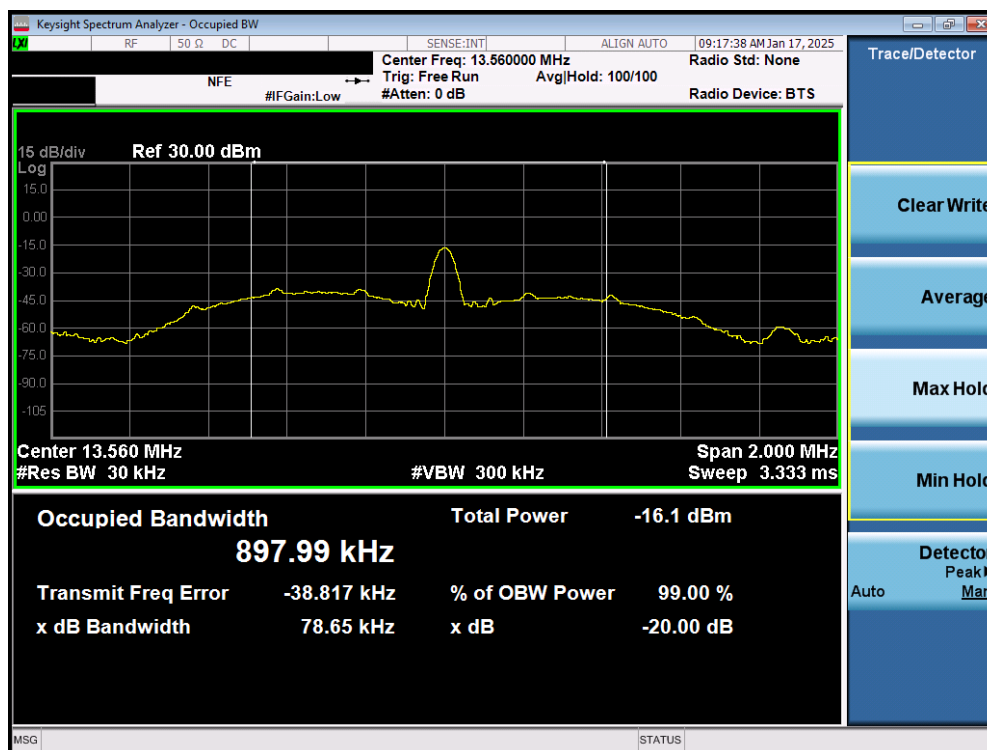


Figure 7-4. Occupied Bandwidth Plot – NFC F

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 13 of 34

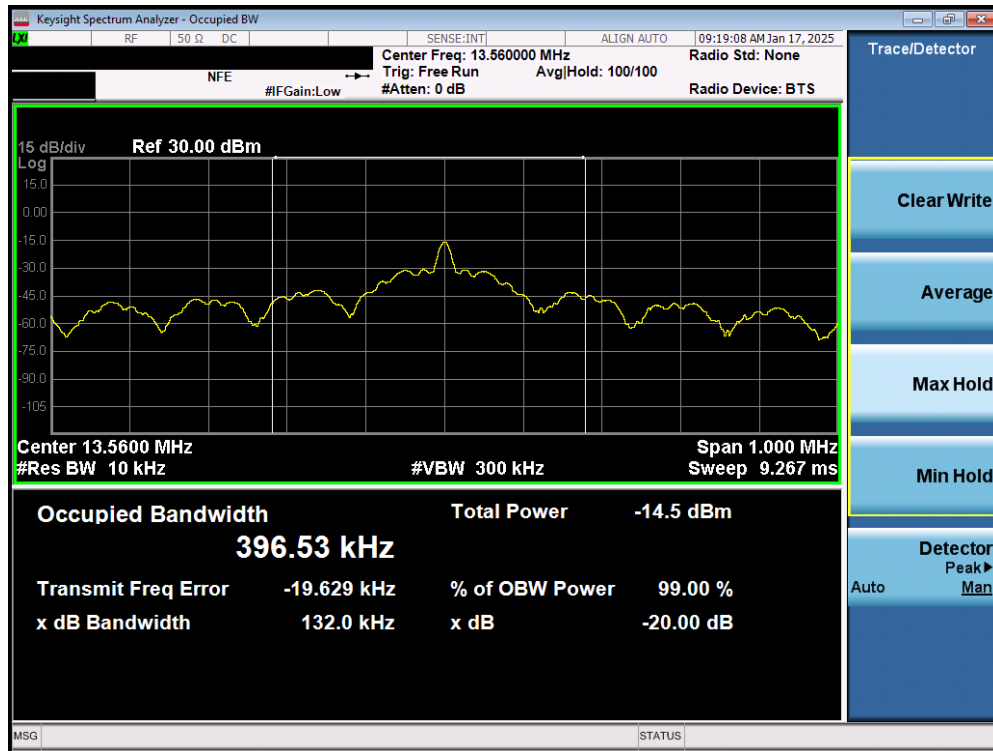


Figure 7-5. Occupied Bandwidth Plot – NFC V

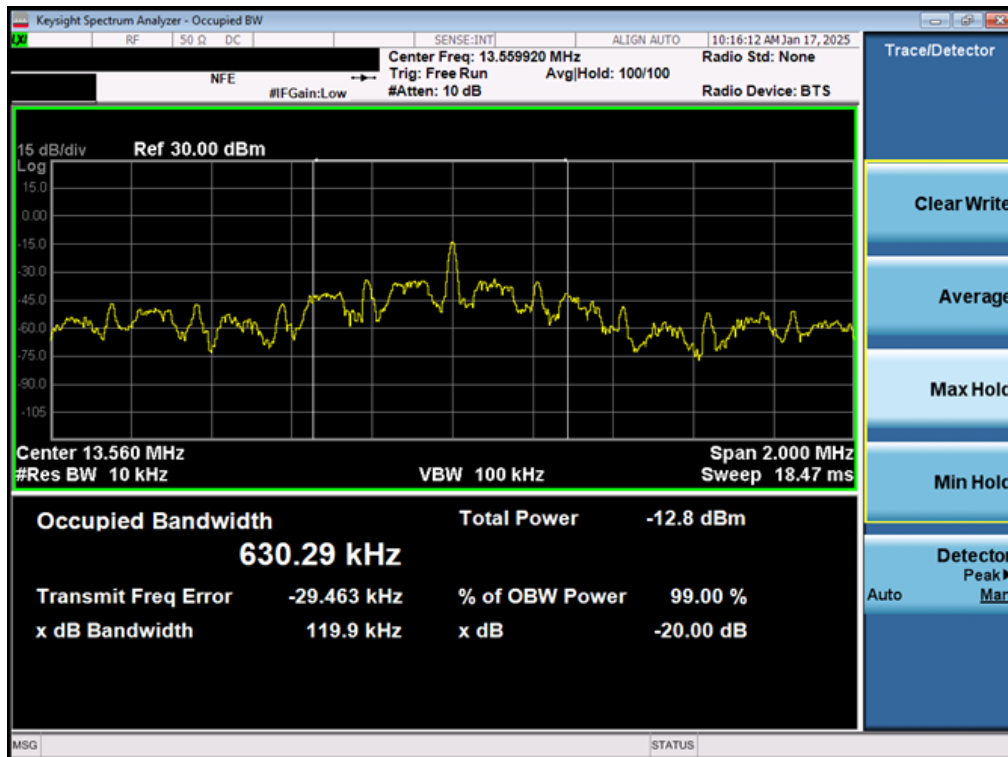


Figure 7-6. Occupied Bandwidth Plot – Pen Wireless Charging

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 14 of 34



### 7.3 Frequency Stability Test Data

§15.225; RSS-210 (B.6)

#### Test Overview and Limit

Frequency stability testing is performed in accordance with the guidelines of ANSI C63.10-2013. The frequency stability of the transmitter is measured by:

- a.) **Temperature:** The temperature is varied from -20°C to +50°C in 10°C increments using an environmental chamber.
- b.) **Primary Supply Voltage:** The primary supply voltage is varied from 85% to 115% of the nominal value for non hand-carried battery and AC powered equipment. For hand-carried, battery-powered equipment, primary supply voltage is reduced to the battery operating end point which shall be specified by the manufacturer.

***For Part 15.225, the frequency stability of the transmitter shall be maintained within  $\pm 0.01\%$  of the center frequency.***

#### Test Procedure Used

ANSI C63.10-2013 – Section 6.8

#### Test Settings

1. The carrier frequency of the transmitter is measured at room temperature (20°C to provide a reference).
2. The equipment is turned on in a “standby” condition for fifteen minutes before applying power to the transmitter. Measurement of the carrier frequency of the transmitter is made within one minute after applying power to the transmitter.
3. Frequency measurements are made at 10°C intervals ranging from -20°C to +50°C. A period of at least one half-hour is provided to allow stabilization of the equipment at each temperature level.

#### Test Setup

The EUT was connected via an RF cable to a spectrum analyzer with the EUT placed inside an environmental chamber.

#### Test Notes

None.

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 15 of 34

© 2025 ELEMENT

V 11.1 08/28/2023

Unless otherwise specified, no part of this report may be reproduced or utilized in any part, form or by any means, electronic or mechanical, including photocopying and microfilm, without written permission from Element. If you have any questions about this or have an inquiry about obtaining additional rights to this report or assembly of contents thereof, please contact [ct.info@element.com](mailto:ct.info@element.com).



## Frequency Stability Test Data

§15.225; RSS-210 (B.6)

OPERATING FREQUENCY: 13,560,000 Hz  
REFERENCE VOLTAGE: 8.83 VDC  
DEVIATION LIMIT: ± 0.01 % = 1356Hz

VOLTAGE (%)	POWER (VDC)	TEMP (°C)	FREQUENCY (Hz)	Freq. Dev. (Hz)	Deviation (%)
100 %	8.83	+ 20 (Ref)	13,559,968	-32	-0.0002360
100 %		- 30	13,559,678	-322	-0.0023746
100 %		- 20	13,559,560	-440	-0.0032448
100 %		- 10	13,558,900	-1,100	-0.0081121
100 %		0	13,560,052	52	0.0003835
100 %		+ 10	13,560,663	663	0.0048894
100 %		+ 30	13,560,899	899	0.0066298
100 %		+ 40	13,561,045	1,045	0.0077065
100 %		+ 50	13,560,555	555	0.0040929
85 %		+ 20	13,559,978	-22	-0.0001622
BATT. ENDPOINT	6.53	+ 20	13,560,669	669	0.0049336

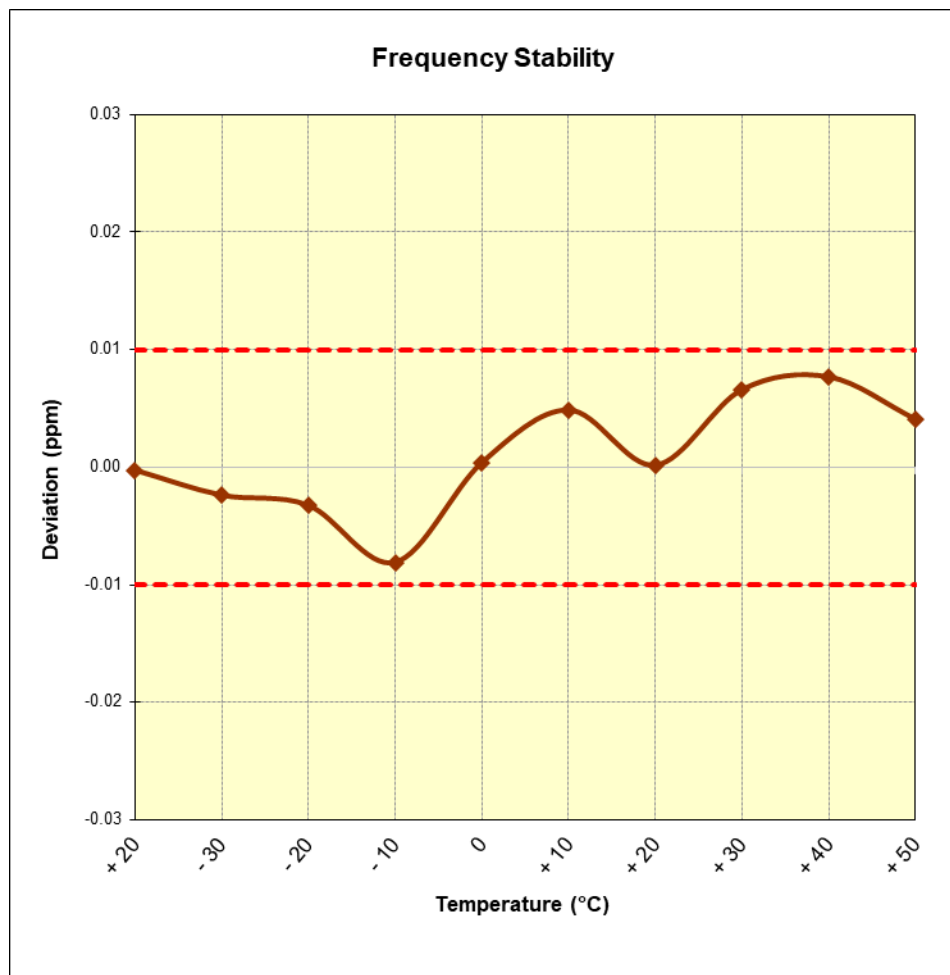
Table 7-3. Frequency Stability Test Data

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 16 of 34



## Frequency Stability Test Data

§15.225; RSS-210 (B.6)



**Figure 7-7. Frequency Stability Plot**

<b>FCC ID:</b> C3K2109	<b>MEASUREMENT REPORT (CERTIFICATION)</b>		<b>Approved by:</b> Technical Manager
<b>Test Report S/N:</b> 1M2501020002-13.C3K	<b>Test Dates:</b> 1/2/2025 - 1/31/2025	<b>EUT Type:</b> Portable Computing Device	Page 17 of 34

## 7.4 In-Band Radiated Spurious Emission Measurements

§15.225(a)(b)(c); RSS-210 (B.6)

### Test Overview and Limit

The EUT was tested from 13.110 – 14.010 MHz. All in-band radiated spurious emissions are measured with a spectrum analyzer connected to a loop antenna while the EUT is operating at appropriate frequencies. Only the radiated emissions of the configuration that produced the worst case emissions are reported in this section.

***All in-band emissions appearing in a restricted band as specified in Section 15.225 of the Title 47 CFR must not exceed the limits shown in Table 7-4.***

Frequency [MHz]	Field Strength [ $\mu\text{V/m}$ ]	Measured Distance [Meters]
13.553-13.567 MHz	15,848	30
13.410-13.553 MHz and 13.567-13.710 MHz	334	30
13.110-13.410 MHz and 13.710-14.010 MHz	106	30

**Table 7-4. Radiated Limits**

### Test Procedures Used

ANSI C63.10-2013 – Section 6.4.7

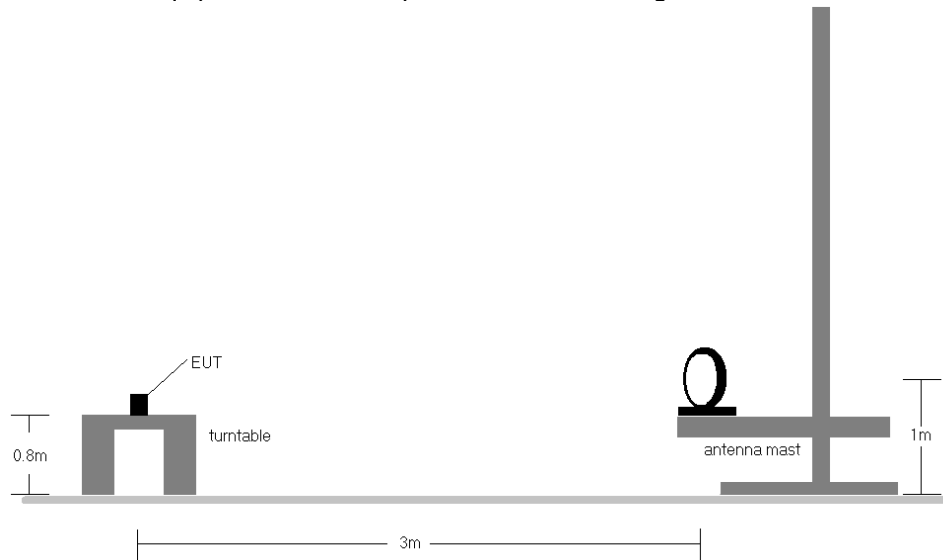
### Test Settings

1. RBW = 9kHz
2. VBW  $\geq 3 \times$  RBW
3. Detector = peak
4. Sweep time = auto couple
5. Trace mode = max hold
6. Trace was allowed to stabilize

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 18 of 34

### Test Setup

The EUT and measurement equipment were set up as shown in the diagram below.



**Figure 7-8. Radiated Test Setup**

### Test Notes:

1. All emissions lying in restricted bands specified in §15.225 and RSS-210 are below the limit shown in Table 7-4.
2. All measurements were performed using a loop antenna. The antenna was positioned in three orthogonal positions (X front, Y side, Z top) and the position with the highest emission level was recorded.
3. The EUT was positioned in three orthogonal planes to determine the orientation resulting in the worst case emissions.
4. Measurements were performed at 3m and the data was extrapolated to the specified measurement distance of 30m using the square of an inverse linear distance extrapolation factor (40 dB/decade) as specified in §15.31(f)(2). Extrapolation Factor =  $20 \log_{10}(30/3)^2 = 40\text{dB}$ .
5. The spectrum was investigated from 9kHz up to 30MHz using the loop antenna. Only the emissions shown in the table below were found to be significant.
6. The "-" shown in the following RSE tables are used to denote a noise floor measurement.

### Sample Calculation

- Field Strength Level  $[\text{dB}\mu\text{V/m}] = \text{Analyzer Level} [\text{dBm}] + 107 + \text{AFCL} [\text{dB/m}]$
- $\text{AFCL} [\text{dB/m}] = \text{Antenna Factor} [\text{dB/m}] + \text{Cable Loss} [\text{dB}]$
- $\text{Margin} [\text{dB}] = \text{Field Strength Level} [\text{dB}\mu\text{V/m}] - \text{Limit} [\text{dB}\mu\text{V/m}]$

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 19 of 34



## In-Band Radiated Spurious Emission Measurements – NFC A

§15.225(a)(b)(c); RSS-210 (B.6)

Frequency: 13.56MHz

Measurement Distance: 3 Meters

Frequency [MHz]	Ant. Pol. [X/Y/Z]	Antenna Height [cm]	Turntable Azimuth [degree]	Level [dBm]	AFCL [dB/m]	3m Field Strength [dBµV/m]	30m Field Strength [dBµV/m]	Limit [µV/m]	Limit [dBµV/m]	Margin [dB]
13.281	X	100	148	-95.98	22.06	33.08	-6.92	106.00	40.51	-47.42
13.346	X	100	148	-93.70	22.13	35.43	-4.57	106.00	40.51	-45.08
13.455	X	100	148	-92.82	22.09	36.27	-3.73	334.00	50.47	-54.21
13.560	X	100	148	-84.86	22.25	44.39	4.39	15848.00	84.00	-79.61
13.631	X	100	148	-92.56	22.29	36.73	-3.27	334.00	50.47	-53.75
13.772	X	100	148	-94.32	21.97	34.65	-5.35	106.00	40.51	-45.86
13.831	X	100	148	-95.22	22.23	34.01	-5.99	106.00	40.51	-46.50

Table 7-5. In-Band Radiated Measurements – NFC

Frequency [MHz]	Ant. Pol. [X/Y/Z]	Antenna Height [cm]	Turntable Azimuth [degree]	Level [dBm]	AFCL [dB/m]	3m Field Strength [dBµV/m]	30m Field Strength [dBµV/m]	Limit [µV/m]	Limit [dBµV/m]	Margin [dB]
13.281	X	100	271	-97.78	22.06	31.28	-8.72	106.00	40.51	-49.22
13.346	X	100	271	-97.15	22.13	31.98	-8.02	106.00	40.51	-48.53
13.455	X	100	271	-97.56	22.09	31.53	-8.47	334.00	50.47	-58.95
13.560	X	100	271	-92.04	22.25	37.21	-2.79	15848.00	84.00	-86.79
13.631	X	100	271	-97.41	22.29	31.88	-8.12	334.00	50.47	-58.60
13.772	X	100	271	-96.92	21.97	32.05	-7.95	106.00	40.51	-48.46
13.831	X	100	271	-97.12	22.23	32.11	-7.89	106.00	40.51	-48.40

Table 7-6. In-Band Radiated Measurements – Pen Charging

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 20 of 34

## 7.5 Radiated Spurious Emission Measurements, Out-of-Band

§15.209 §15.225(d); RSS-Gen (8.9)

### Test Overview and Limit

The EUT was tested from 9kHz up to the 1GHz excluding the band 13.110 – 14.010 MHz.

***All out-of-band emissions appearing in a restricted band as specified in Section 15.225 of the Title 47 CFR must not exceed the limits shown in Table 7-7 per Section 15.209.***

Frequency	Field Strength [μV/m]	Measured Distance [Meters]
0.009 – 0.490 MHz	2400/F (kHz)	300
0.490 – 1.705 MHz	24000/F (kHz)	30
1.705 – 30.00 MHz	30	30
30.00 – 88.00 MHz	100	3
88.00 – 216.0 MHz	150	3
216.0 – 960.0 MHz	200	3
Above 960.0 MHz	500	3

**Table 7-7. Radiated Limits – Out of band**

### Test Procedures Used

ANSI C63.10-2013 – Section 6.5.4

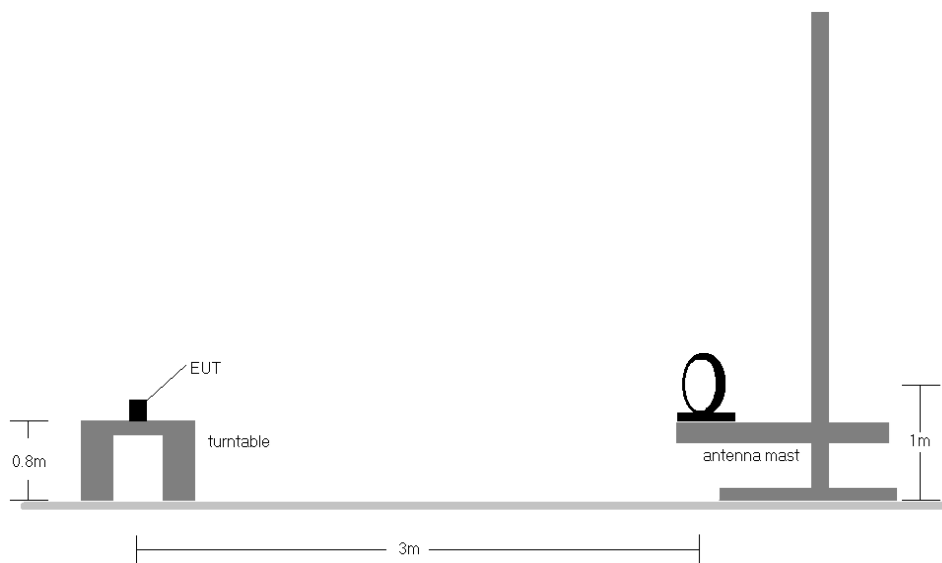
### Test Settings

1. Analyzer center frequency was set to the frequency of the radiated spurious emission of interest
2. RBW = 9kHz for emissions below 30MHz and 100kHz for emissions between 30MHz and 1GHz
3. VBW ≥ 3 x RBW
4. Detector = peak
5. Sweep time = auto couple
6. Trace mode = max hold
7. Trace was allowed to stabilize

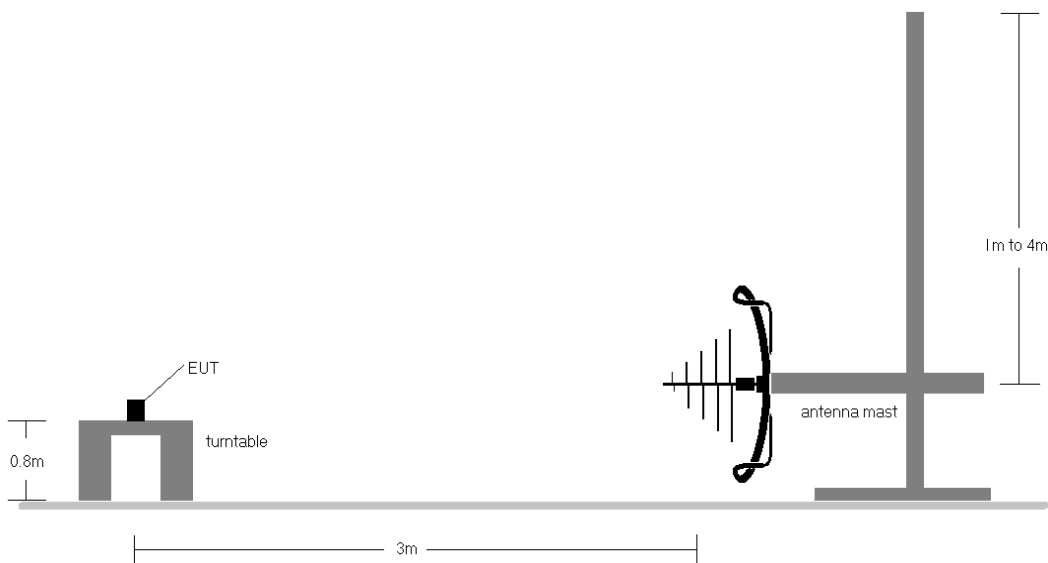
FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 21 of 34

### Test Setup

The EUT and measurement equipment were set up as shown in the diagram below.



**Figure 7-9. Radiated Test Setup < 30MHz**



**Figure 7-10. Radiated Test Setup > 30MHz**

<b>FCC ID:</b> C3K2109	<b>MEASUREMENT REPORT (CERTIFICATION)</b>		<b>Approved by:</b> Technical Manager
<b>Test Report S/N:</b> 1M2501020002-13.C3K	<b>Test Dates:</b> 1/2/2025 - 1/31/2025	<b>EUT Type:</b> Portable Computing Device	Page 22 of 34

### Test Notes:

1. A loop antenna was used to investigate emissions below 30MHz.
2. Both Vertical and Horizontal polarities of the receive antenna were evaluated with the worst case emissions being reported. Below 30MHz the loop antenna was positioned in 3 orthogonal planes (X front, Y side, Z top) to determine the orientation resulting in the worst case emissions.
3. The EUT was positioned in three orthogonal planes to determine the orientation resulting in the worst case emissions.
4. The spectrum is measured from 9kHz to the 10<sup>th</sup> harmonic and the worst-case emissions are reported.
5. No spurious emissions levels were found to be greater than the level of the fundamental.
6. The "-" shown in the following RSE tables are used to denote a noise floor measurement.

### Sample Calculation

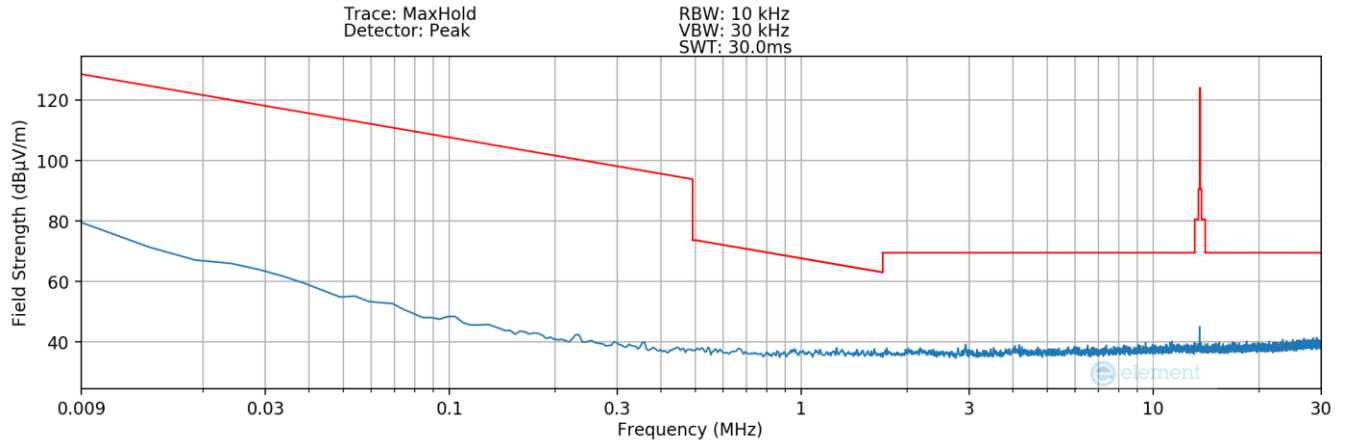
- Field Strength Level  $_{[dB\mu V/m]} = \text{Analyzer Level }_{[dBm]} + 107 + \text{AFCL }_{[dB/m]}$
- AFCL  $_{[dB/m]} = \text{Antenna Factor }_{[dB/m]} + \text{Cable Loss }_{[dB]}$
- Margin  $_{[dB]} = \text{Field Strength Level }_{[dB\mu V/m]} - \text{Limit }_{[dB\mu V/m]}$

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 23 of 34

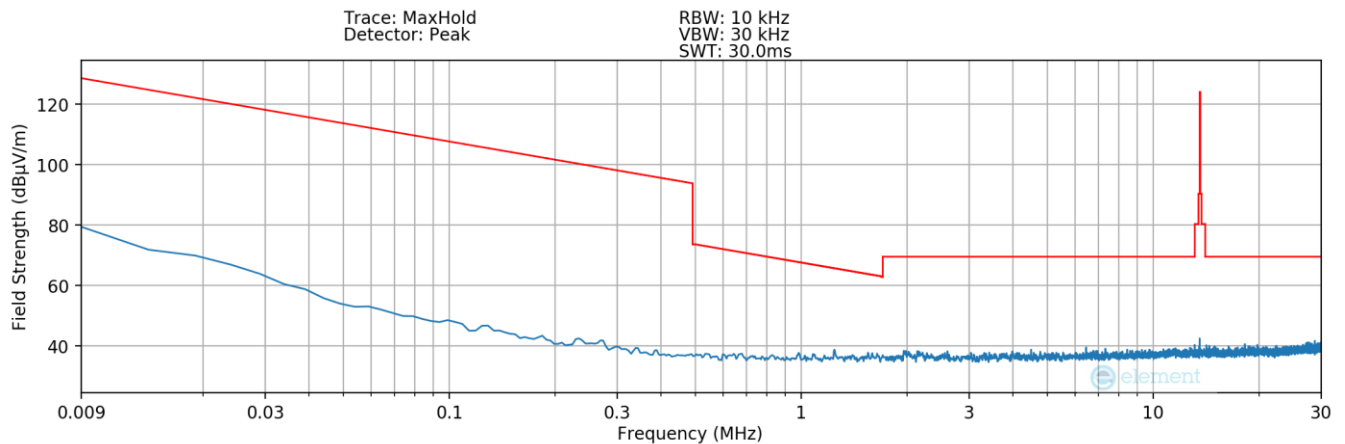


## Radiated Spurious Emission Measurements, Out-of-Band – NFC A

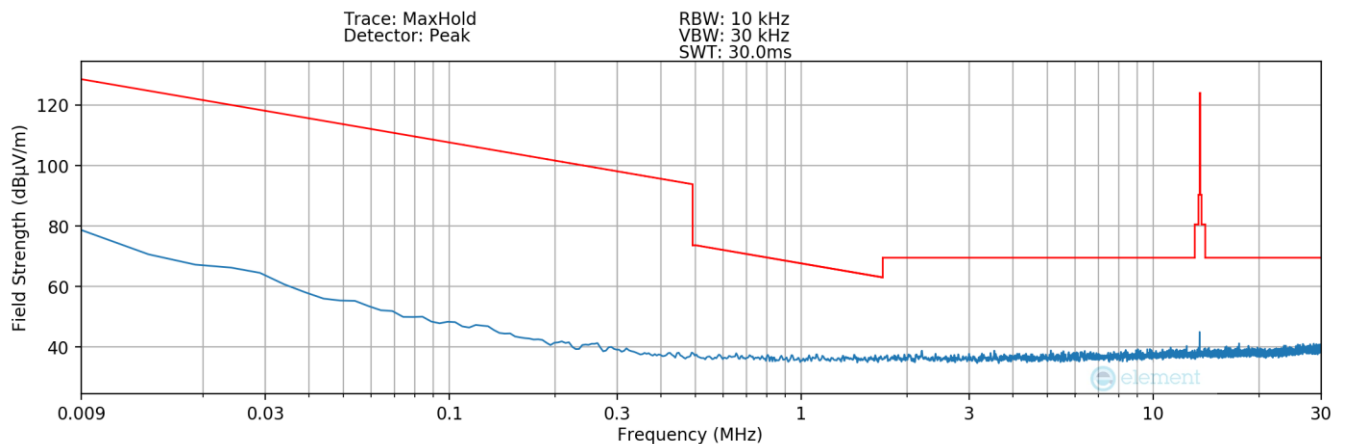
§15.209 §15.225(d); RSS-Gen (8.9)



Plot 7-1. Radiated Spurious Plot 9kHz – 30MHz (Pol. X)



Plot 7-2. Radiated Spurious Plot 9kHz – 30MHz (Pol. Y)



Plot 7-3. Radiated Spurious Plot 9kHz – 30MHz (Pol. Z)

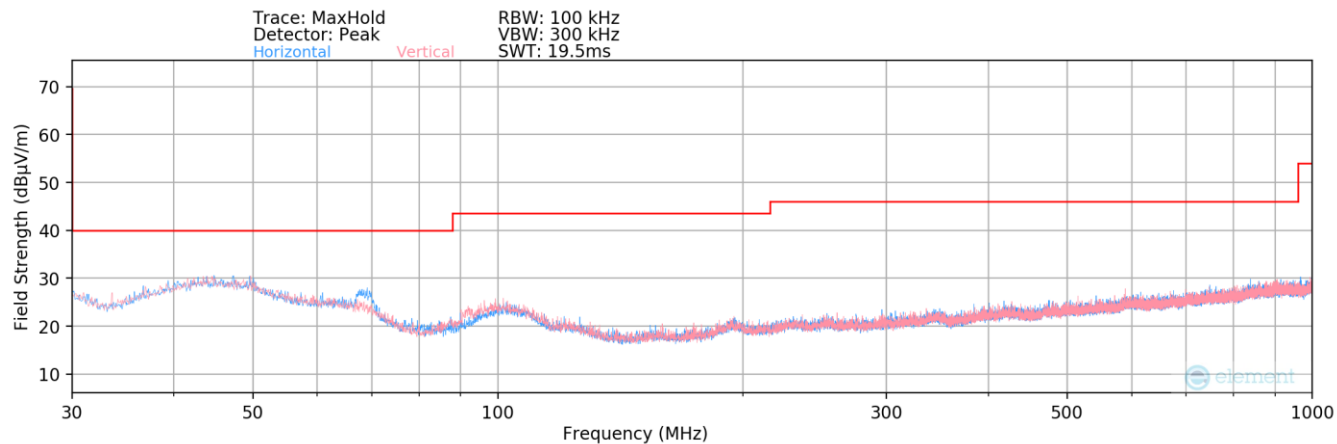
FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 24 of 34

© 2025 ELEMENT

V 11.1 08/28/2023

Unless otherwise specified, no part of this report may be reproduced or utilized in any part, form or by any means, electronic or mechanical, including photocopying and microfilm, without written permission from Element. If you have any questions about this or have an inquiry about obtaining additional rights to this report or assembly of contents thereof, please contact [ct.info@element.com](mailto:ct.info@element.com).





**Plot 7-4. Radiated Spurious Plot 30MHz – 1GHz**

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 25 of 34



**Radiated Spurious Emission Measurements, Out-of-Band – NFC A**  
**§15.209 §15.225(d); RSS-Gen (8.9)**

Tx Frequency 13.56MHz

Measurement Distance: 3 Meters

Frequency [MHz]	Ant. Pol. [H/V]	Antenna Height [cm]	Turntable Azimuth [degree]	Level [dBm]	AFCL [dB/m]	3m Field Strength [dBµV/m]	Limit [dBµV/m]	Margin [dB]
27.12	X	-	-	-96.33	24.18	34.85	69.54	-34.70
40.68	H	112	228	-63.96	-12.46	30.58	40.00	-9.42
54.24	V	-	-	-68.37	-11.37	27.26	40.00	-12.74
67.80	H	134	97	-66.17	-15.00	25.83	40.00	-14.17
81.36	H	-	-	-66.23	-18.36	22.41	40.00	-17.59
94.92	V	-	-	-68.06	-14.38	24.56	43.52	-18.96
108.48	H	-	-	-68.70	-13.75	24.55	43.52	-18.98
149.16	H	-	-	-69.92	-17.06	20.02	43.52	-23.50
596.64	V	-	-	-75.92	-4.62	26.46	46.02	-19.56

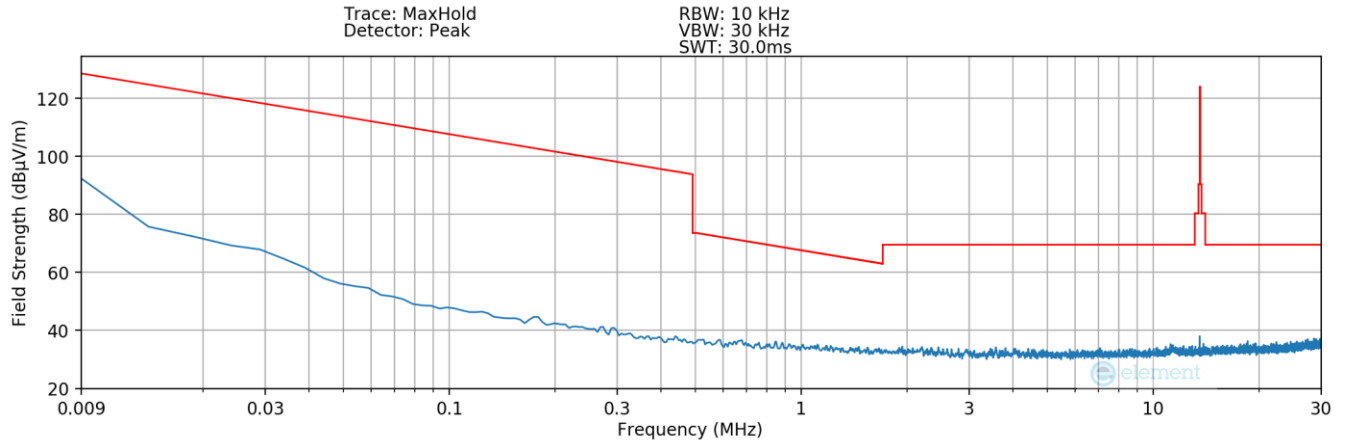
**Table 7-8. Radiated Measurements**

<b>FCC ID:</b> C3K2109	<b>MEASUREMENT REPORT (CERTIFICATION)</b>		<b>Approved by:</b> Technical Manager
<b>Test Report S/N:</b> 1M2501020002-13.C3K	<b>Test Dates:</b> 1/2/2025 - 1/31/2025	<b>EUT Type:</b> Portable Computing Device	Page 26 of 34

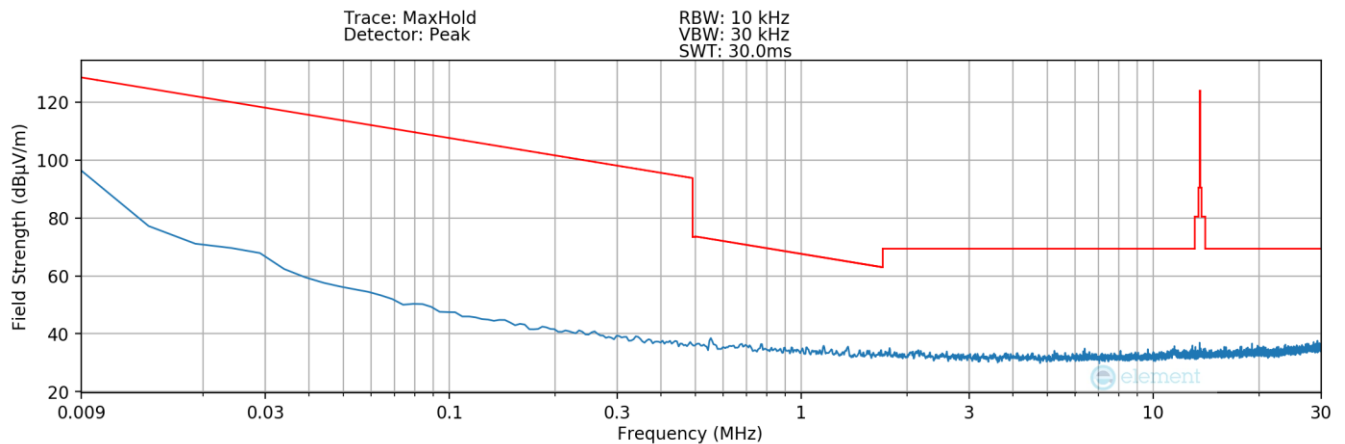


## Radiated Spurious Emission Measurements, Out-of-Band – Pen Charging

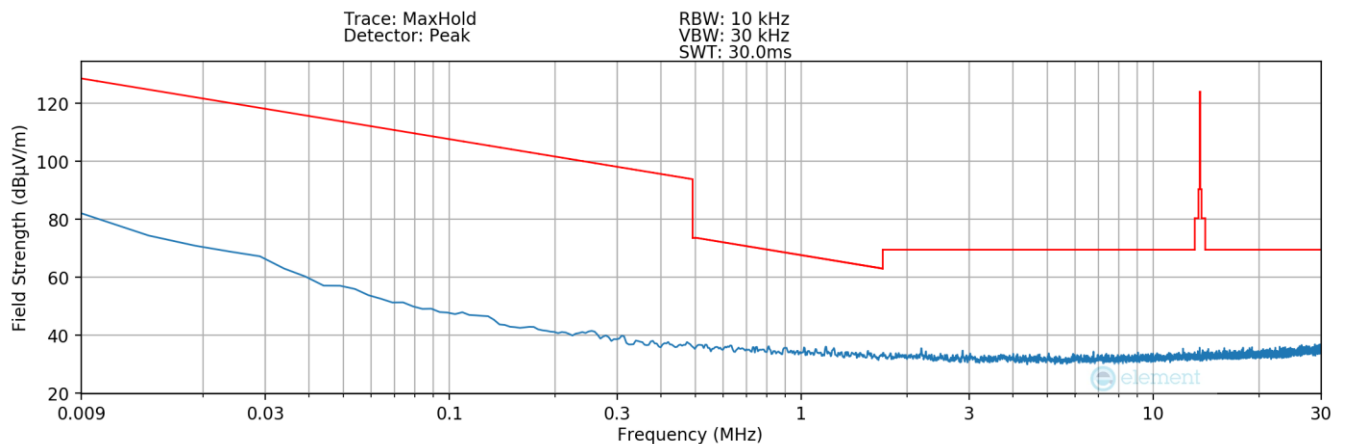
§15.209 §15.225(d); RSS-Gen (8.9)



Plot 7-5. Radiated Spurious Plot 9kHz – 30MHz (Pol. X)



Plot 7-6. Radiated Spurious Plot 9kHz – 30MHz (Pol. Y)



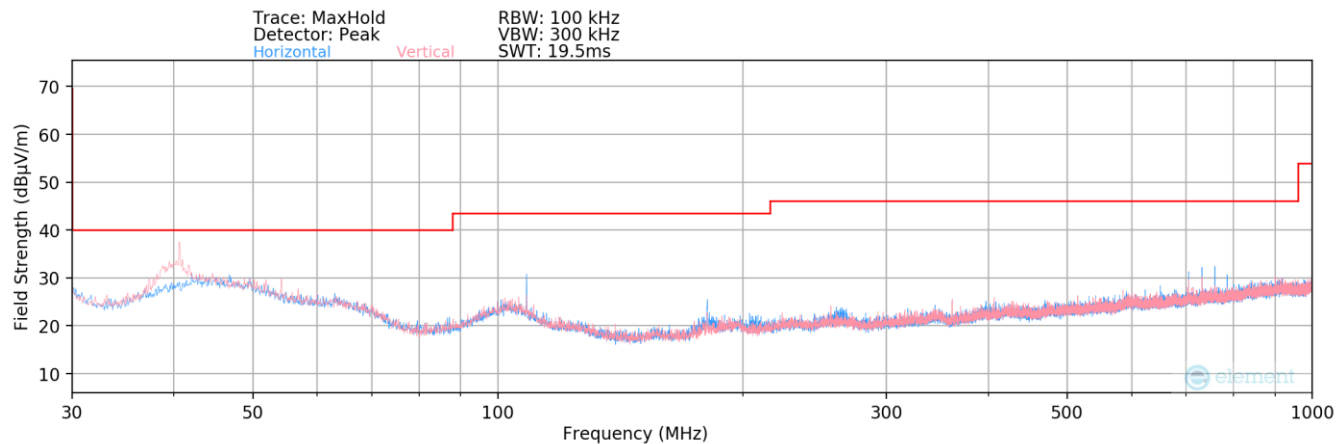
Plot 7-7. Radiated Spurious Plot 9kHz – 30MHz (Pol. Z)

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 27 of 34

© 2025 ELEMENT

V 11.1 08/28/2023

Unless otherwise specified, no part of this report may be reproduced or utilized in any part, form or by any means, electronic or mechanical, including photocopying and microfilm, without written permission from Element. If you have any questions about this or have an inquiry about obtaining additional rights to this report or assembly of contents thereof, please contact [ct.info@element.com](mailto:ct.info@element.com).



**Plot 7-8. Radiated Spurious Plot 30MHz – 1GHz**

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 28 of 34



## Radiated Spurious Emission Measurements, Out-of-Band – Pen Charging

§15.209 §15.225(d); RSS-Gen (8.9)

Tx Frequency 13.56MHz

Measurement Distance: 3 Meters

Frequency [MHz]	Ant. Pol. [H/V]	Antenna Height [cm]	Turntable Azimuth [degree]	Level [dBm]	AFCL [dB/m]	3m Field Strength [dBµV/m]	Limit [dBµV/m]	Margin [dB]
27.12	X	-	-	-96.41	24.18	34.77	69.54	-34.78
40.68	V	112	152	-57.71	-12.46	36.83	40.00	-3.17
54.24	V	124	182	-66.27	-11.37	29.36	40.00	-10.64
67.80	V	-	-	-66.42	-15.00	25.58	40.00	-14.42
81.36	H	209	262	-66.68	-18.36	21.96	40.00	-18.04
94.92	V	-	-	-66.91	-14.38	25.71	43.52	-17.81
108.48	H	262	111	-63.96	-13.75	29.29	43.52	-14.24
189.84	H	178	259	-66.02	-14.20	26.78	43.52	-16.74
360.00	V	128	117	-70.39	-10.19	26.42	46.02	-19.60
759.36	H	148	322	-73.99	-2.52	30.49	46.02	-15.53
772.92	H	292	321	-72.55	-2.48	31.97	46.02	-14.05
786.48	H	174	331	-72.70	-2.25	32.05	46.02	-13.97

**Table 7-9. Radiated Measurements**

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 29 of 34

## 7.6 Line Conducted Measurement Data

§15.207; RSS-Gen (8.8)

### Test Overview and Limit

All AC line conducted spurious emissions are measured with a receiver connected to a grounded LISN while the EUT is operating at its maximum duty cycle, at maximum power, and at the appropriate frequencies. All data rates and modes were investigated for conducted spurious emissions. Only the conducted emissions of the configuration that produced the worst case emissions are reported in this section.

***All conducted emissions must not exceed the limits shown in the table below, per Section 15.207 and RSS-Gen (8.8).***

Frequency of emission (MHz)	Conducted Limit (dBμV)	
	Quasi-peak	Average
0.15 – 0.5	66 to 56*	56 to 46*
0.5 – 5	56	46
5 – 30	60	50

**Table 7-10. Conducted Limits**

\*Decreases with the logarithm of the frequency.

### Test Procedures Used

ANSI C63.10-2013, Section 6.2

### Test Settings

#### Quasi-Peak Field Strength Measurements

1. Analyzer center frequency was set to the frequency of the spurious emission of interest
2. RBW = 9kHz (for emissions from 150kHz – 30MHz)
3. Detector = quasi-peak
4. Sweep time = auto couple
5. Trace mode = max hold
6. Trace was allowed to stabilize

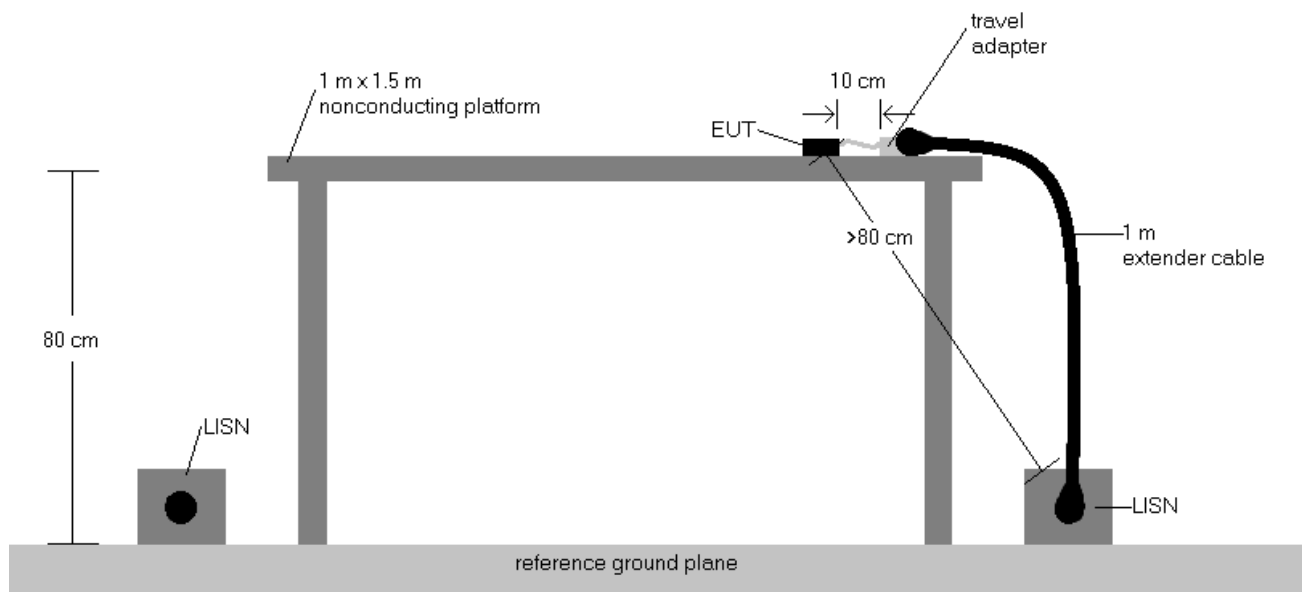
#### Average Field Strength Measurements

1. Analyzer center frequency was set to the frequency of the spurious emission of interest
2. RBW = 9kHz (for emissions from 150kHz – 30MHz)
3. Detector = RMS
4. Sweep time = auto couple
5. Trace mode = max hold
6. Trace was allowed to stabilize

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 30 of 34

## Test Setup

The EUT and measurement equipment were set up as shown in the diagram below.

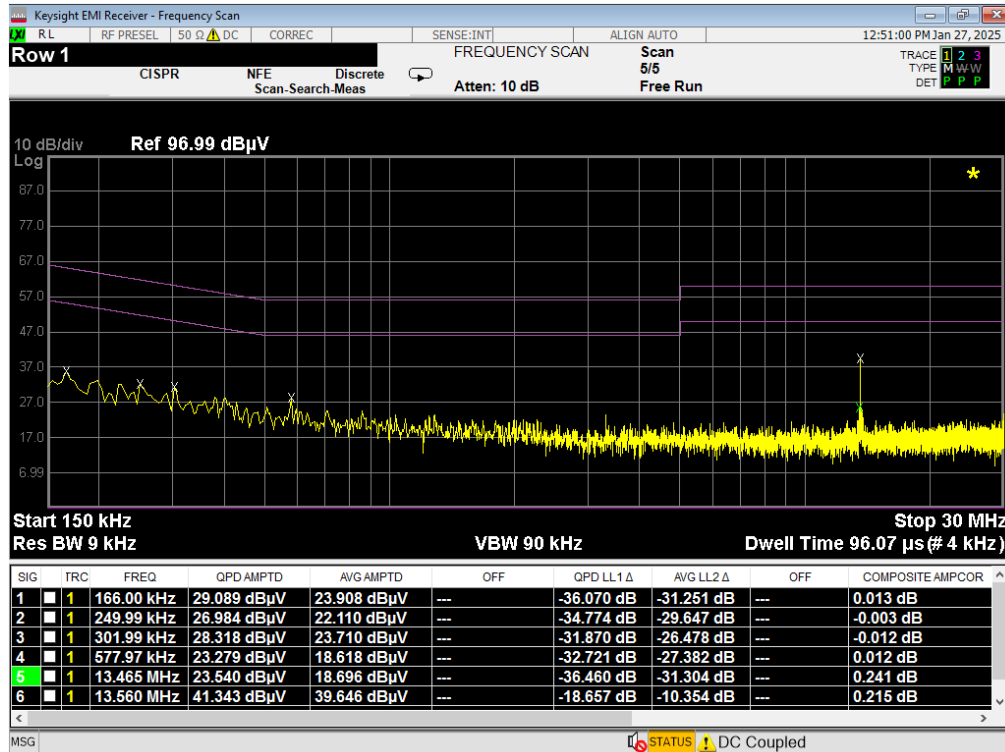


**Figure 7-11. Test Instrument & Measurement Setup**

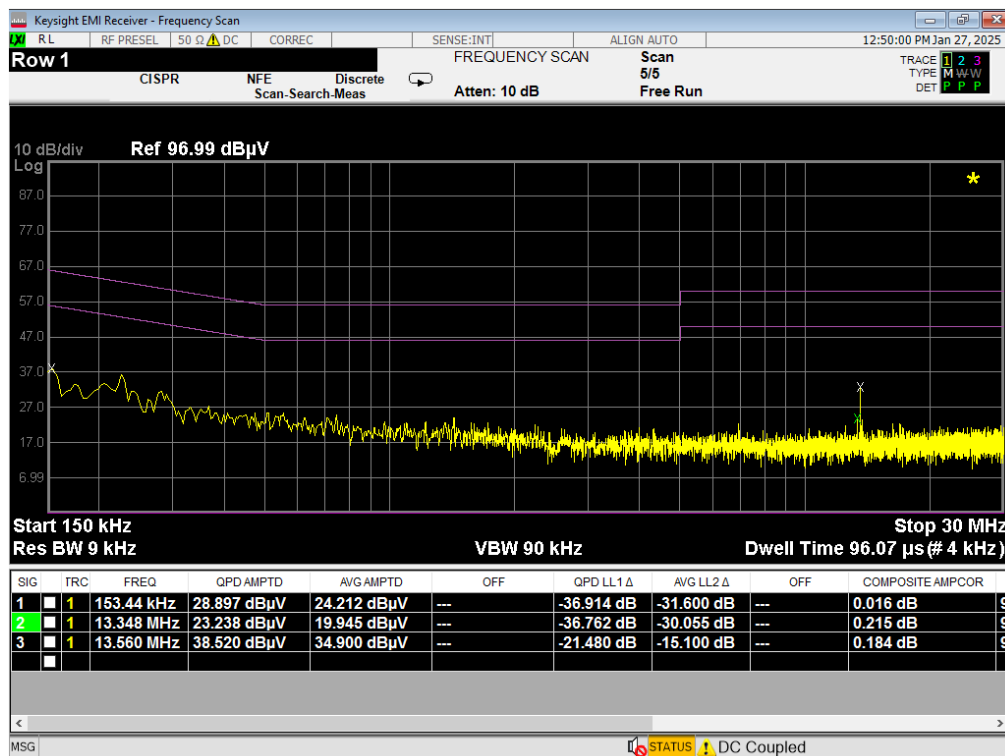
## Test Notes

1. All modes of operation were investigated and the worst-case emissions are reported using mid channel. The emissions found were not affected by the choice of channel used during testing.
2. The limit for an intentional radiator from 150kHz to 30MHz are specified in 15.207 and RSS-Gen (8.8).
3.  $\text{Corr. (dB)} = \text{Cable loss (dB)} + \text{LISN insertion factor (dB)}$
4.  $\text{QP/AV Level (dB}\mu\text{V)} = \text{QP/AV Analyzer/Receiver Level (dB}\mu\text{V)} + \text{Corr. (dB)}$
5.  $\text{Margin (dB)} = \text{QP/AV Limit (dB}\mu\text{V)} - \text{QP/AV Level (dB}\mu\text{V)}$
6. Traces shown in plot are made using a peak detector.
7. Deviations to the Specifications: None.
8. EUT was tested with the antenna terminated.

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 31 of 34



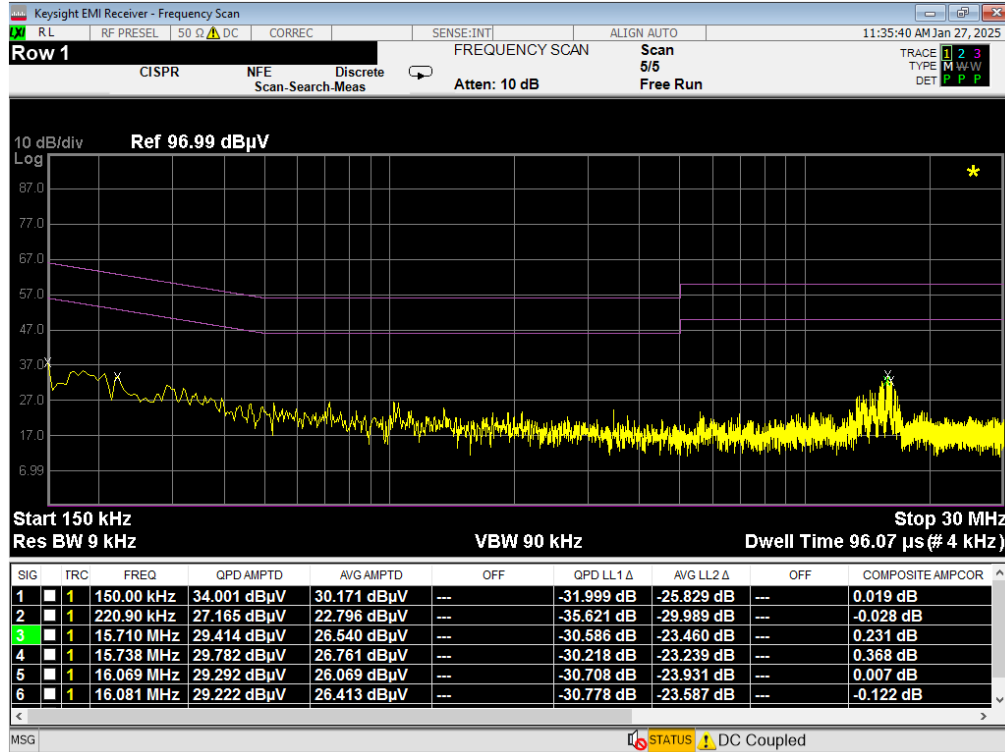
Plot 7-9. Line-Conducted Test Plot (L1) – NFC – A



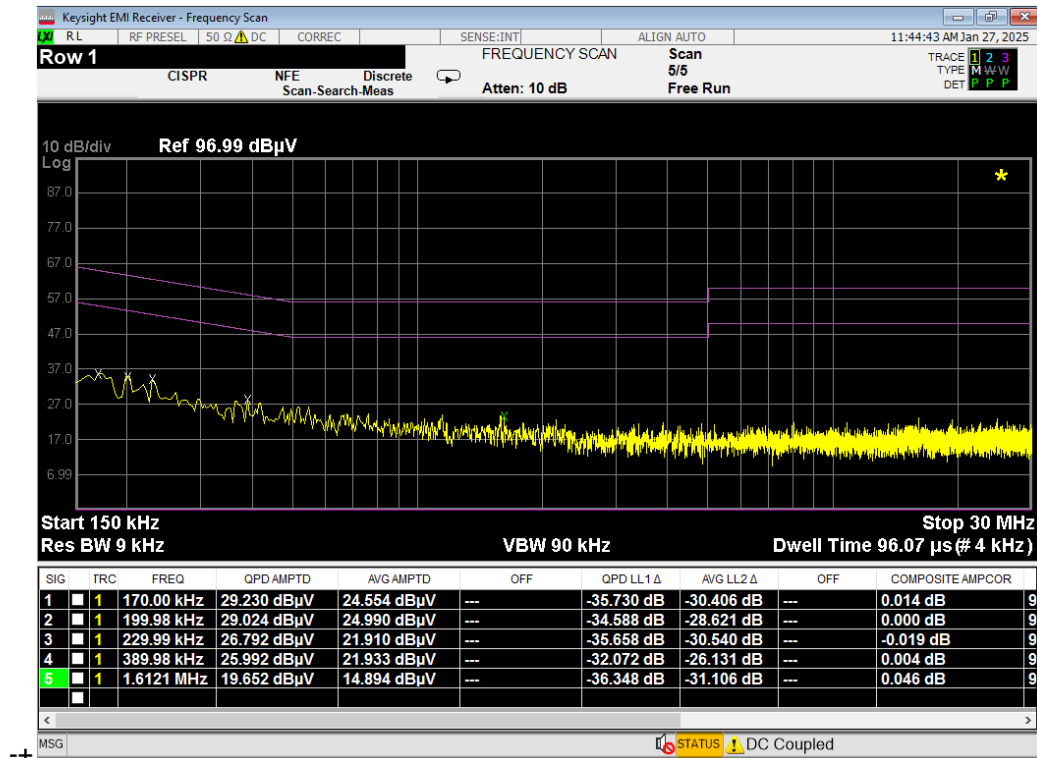
Plot 7-10. Line-Conducted Test Plot (N) – NFC – A

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 32 of 34





Plot 7-11. Line-Conducted Test Plot (L1) – Pen Charging



Plot 7-12. Line-Conducted Test Plot (N) – Pen Charging

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 33 of 34

## 8.0 CONCLUSION

The data collected relate only to the item(s) tested and show that the **Microsoft Portable Computing Device FCC ID: C3K2109** has been tested to show compliance with Part 15 Subpart C (15.225) of the FCC Rules for both NFC modes of operation (authenticator mode and wireless power transfer mode).

FCC ID: C3K2109	MEASUREMENT REPORT (CERTIFICATION)		Approved by: Technical Manager
Test Report S/N: 1M2501020002-13.C3K	Test Dates: 1/2/2025 - 1/31/2025	EUT Type: Portable Computing Device	Page 34 of 34