

HEARING AID COMPATIBILITY T-COIL TEST REPORT

FCC ID : IHDT56AU1
Equipment : Mobile Cellular Phone
Brand Name : Motorola
Model Name : XT2551-7
Test Results : PASS
Applicant : Motorola Mobility LLC
222 W, Merchandise Mart Plaza, Chicago IL 60654 USA
Manufacturer : Motorola Mobility LLC
222 W, Merchandise Mart Plaza, Chicago IL 60654 USA
Standard : FCC 47 CFR §20.19
ANSI C63.19-2019
Date Tested : Jul. 01, 2025

We, Sporton International Inc. (Kunshan), would like to declare that the tested sample provide by manufacturer and the test data has been evaluated in accordance with the test procedures given in ANSI C63.19-2019 / 47 CFR Part 20.19 and has been in compliance with the applicable technical standards.

The test results in this report apply exclusively to the tested model / sample. Without written approval of Sporton International Inc. (Kunshan), the test report shall not be reproduced except in full.



Approved by: Si Zhang

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History of this test report

Report No.	Version	Description	Issued Date
HA4N2802-04B	Rev. 01	Initial issue of report	Jul. 31, 2025

**1. General Information**

Product Feature & Specification	
Applicant Name	Motorola Mobility LLC
Equipment Name	Mobile Cellular Phone
Brand Name	Motorola
Model Name	XT2551-7
IMEI Code	350200470003593/350200470003601
FCC ID	IHDT56AU1
HW	PVT
SW	V2VL35.42-126
EUT Stage	Identical Prototype
Frequency Band	GSM850: 824 MHz ~ 849 MHz GSM1900: 1850MHz ~ 1910MHz WCDMA Band II: 1850 MHz ~ 1910 MHz WCDMA Band IV: 1710 MHz ~ 1755 MHz WCDMA Band V: 824 MHz ~ 849 MHz LTE Band 2: 1850 MHz ~ 1910 MHz LTE Band 4: 1710 MHz ~ 1755 MHz LTE Band 5: 824 MHz ~ 849 MHz LTE Band 7: 2500 MHz ~ 2570 MHz LTE Band 12: 699 MHz ~ 716 MHz LTE Band 13: 777 MHz ~ 787 MHz LTE Band 14: 788 MHz ~ 798 MHz LTE Band 17: 704 MHz ~ 716 MHz LTE Band 25: 1850 MHz ~ 1915 MHz LTE Band 26: 814 MHz ~ 849 MHz LTE Band 30: 2305 MHz ~ 2315 MHz LTE Band 38: 2570 MHz ~ 2620 MHz LTE Band 41: 2496 MHz ~ 2690 MHz LTE Band 42: 3450 MHz ~ 3600 MHz LTE Band 43: 3600 MHz ~ 3700 MHz LTE Band 48: 3550 MHz ~ 3700 MHz LTE Band 66: 1710 MHz ~ 1780 MHz LTE Band 71: 663 MHz ~ 698 MHz 5G NR n2 : 1850 MHz ~ 1910 MHz 5G NR n5 : 824 MHz ~ 849 MHz 5G NR n7 : 2500 MHz ~ 2570 MHz 5G NR n12 : 699 MHz ~ 716 MHz 5G NR n14 : 788 MHz ~ 798 MHz 5G NR n25 : 1850 MHz ~ 1915 MHz 5G NR n26 : 814 MHz ~ 849 MHz 5G NR n30 : 2305 MHz ~ 2315 MHz 5G NR n38 : 2570 MHz ~ 2620 MHz 5G NR n41 : 2496 MHz ~ 2690 MHz 5G NR n48 : 3550 MHz ~ 3700 MHz 5G NR n66 : 1710 MHz ~ 1780 MHz 5G NR n70 : 1695 MHz ~ 1710 MHz 5G NR n71 : 663 MHz ~ 698 MHz 5G NR n77: 3700 MHz ~ 3980 MHz, 3450MHz ~ 3550MHz 5G NR n78: 3700 MHz ~ 3800 MHz, 3450MHz ~ 3550MHz WLAN 2.4GHz Band: 2412 MHz ~ 2462 MHz WLAN 5.2GHz Band: 5180 MHz ~ 5240 MHz WLAN 5.3GHz Band: 5260 MHz ~ 5320 MHz WLAN 5.5GHz Band: 5500 MHz ~ 5720 MHz WLAN 5.8GHz Band: 5745 MHz ~ 5825 MHz WLAN 6GHz U-NII 5: 5925 MHz ~ 6425 MHz WLAN 6GHz U-NII 6: 6425 MHz ~ 6525 MHz WLAN 6GHz U-NII 7: 6525 MHz ~ 6875 MHz WLAN 6GHz U-NII 8: 6875 MHz ~ 7125 MHz Bluetooth: 2402 MHz ~ 2480 MHz NFC : 13.56 MHz WPT: 115 KHz ~ 145 KHz UWB: 6489.6MHz & 7987.2MHz
Mode	GSM/GPRS/EGPRS RMC/AMR 12.2Kbps HSDPA HSUPA

	DC-HSDPA HSPA+ (16QAM uplink is not supported) LTE: QPSK, 16QAM, 64QAM, 256QAM 5G NR: DFT-s-OFDM/CP-OFDM, Pi/2 BPSK/QPSK/16QAM/64QAM/256QAM WLAN 2.4GHz 802.11b/g/n HT20/HT40 WLAN 2.4GHz 802.11ax/be HE20/HE40/EHT20/EHT40 WLAN 5GHz 802.11a/n HT20/HT40 WLAN 5GHz 802.11ac VHT20/VHT40/VHT80/VHT160 WLAN 5GHz 802.11ax HE20/HE40/HE80/HE160 WLAN 5GHz 802.11be EHT20/EHT40/EHT80/EHT160 WLAN 6GHz 802.11a/ax HE20/HE40/HE80/HE160 WLAN 6GHz 802.11be EHT20/EHT40/EHT80/EHT160/EHT320 Bluetooth BR/EDR/LE NFC: ASK WPT: ASK UWB: BPM-BPSK
Remark: This is a variant report for XT2551-7, the difference is that please refer to the XT2551-7_Operational Description of Product Equality Declaration which is exhibited separately. According to the differences, only the worst cases from original test report (Sporton Report Number HA4N2802B) were verified for the differences.	

2. Testing Location

Sporton International Inc. (Kunshan) is accredited to ISO/IEC 17025:2017 by American Association for Laboratory Accreditation with Certificate Number 5145.02.

Testing Laboratory			
Test Firm	Sporton International Inc. (Kunshan)		
Test Site Location	No. 1098, Pengxi North Road, Kunshan Economic Development Zone Jiangsu Province 215300 People's Republic of China TEL : +86-512-57900158		
Test Site No.	Sporton Site No.	FCC Designation No.	FCC Test Firm Registration No.
	SAR05-KS	CN1257	314309

3. Applied Standards

- FCC CFR47 Part 20.19
- ANSI C63.19-2019
- FCC KDB 285076 D01 HAC Guidance v06r04
- FCC KDB 285076 D02 T Coil testing v04
- FCC KDB 285076 D03 HAC FAQ v01r07

**4. Air Interface and Operating Mode**

Air Interface	Band MHz	Type	C63.19 Tested	Simultaneous Transmitter	Name of Voice Service	Power State Compliance	
GSM	GSM850	VO	Yes	WLAN, BT, UWB	CMRS Voice	Pmax ⁽⁹⁾	
	GSM1900			WLAN, BT, UWB			
	EDGE850	VD	Yes	WLAN, BT, UWB	Google Meet ⁽¹⁾ google Fi		
	EDGE1900			WLAN, BT, UWB			
UMTS	Band 2	VO	Yes	WLAN, BT, UWB	CMRS Voice	Pmax ⁽⁹⁾	
	Band 4			WLAN, BT, UWB			
	Band 5			WLAN, BT, UWB			
	HSPA	VD	Yes	WLAN, BT, UWB	Google Meet ⁽¹⁾ google Fi		
LTE (FDD)	Band 2	VD	Yes	5G NR, WLAN, BT, UWB	VoLTE / Google Meet ⁽¹⁾ google Fi	Pmax ⁽⁹⁾	
	Band 4			5G NR, WLAN, BT, UWB			
	Band 5			5G NR, WLAN, BT, UWB			
	Band 7			5G NR, WLAN, BT, UWB			
	Band 12			5G NR, WLAN, BT, UWB			
	Band 13			5G NR, WLAN, BT, UWB			
	Band 14			5G NR, WLAN, BT, UWB			
	Band 17			5G NR, WLAN, BT, UWB			
	Band 25			5G NR, WLAN, BT, UWB			
	Band 26			5G NR, WLAN, BT, UWB			
	Band 30			5G NR, WLAN, BT, UWB			
	Band 66			5G NR, WLAN, BT, UWB			
	Band 71			5G NR, WLAN, BT, UWB			
	LTE (TDD)			Band 38			VD
Band 41		5G NR, WLAN, BT, UWB					
Band 42		5G NR, WLAN, BT, UWB					
Band 43		5G NR, WLAN, BT, UWB					
Band 48		5G NR, WLAN, BT, UWB					
5G NR	n2	VD	Yes	LTE, WLAN, BT, UWB	VoNR / Google Meet ⁽¹⁾ google Fi	Pmax ⁽⁹⁾	
	n5			LTE, WLAN, BT, UWB			
	n7			LTE, WLAN, BT, UWB			
	n12			LTE, WLAN, BT, UWB			
	n14			LTE, WLAN, BT, UWB			
	n25			LTE, WLAN, BT, UWB			
	n26			LTE, WLAN, BT, UWB			
	n30			LTE, WLAN, BT, UWB			
	n38			LTE, WLAN, BT, UWB			
	n41			LTE, WLAN, BT, UWB			
	n48			LTE, WLAN, BT, UWB			
	n66			LTE, WLAN, BT, UWB			
	n70			LTE, WLAN, BT, UWB			
	n71			LTE, WLAN, BT, UWB			
	n77			LTE, WLAN, BT, UWB			
	n78			LTE, WLAN, BT, UWB			
Wi-Fi	2450	VD	Yes	GSM, WCDMA, LTE, 5G NR, 5GHz/6GHz WLAN, UWB	VoWiFi / Google Meet ⁽¹⁾ google Fi	Pmax ⁽⁹⁾	
	5200			GSM, WCDMA, LTE, 5G NR, 2.4GHz WLAN, BT, UWB			
	5300			GSM, WCDMA, LTE, 5G NR, 2.4GHz WLAN, BT, UWB			
	5500			GSM, WCDMA, LTE, 5G NR, 2.4GHz WLAN, BT, UWB			
	5800			GSM, WCDMA, LTE, 5G NR, 2.4GHz WLAN, BT, UWB			
Wi-Fi	U-NII 5	VD	Yes ⁽³⁾	GSM, WCDMA, LTE, 5G NR, 2.4GHz WLAN, BT, UWB	VoWiFi / Google Meet ⁽¹⁾ google Fi	Pmax ⁽⁹⁾	
	U-NII 6		No ⁽²⁾				
	U-NII 7						
	U-NII 8						
BT	2450	DT	No	GSM, WCDMA, LTE, 5G NR, 5GHz/6GHz WLAN, UWB	NA	NA	
UWB	UWB	DT	No	GSM, WCDMA, LTE, 5G NR, WLAN, BT	NA	NA	

Type Transport:

VO= Voice only

DT= Digital Transport only (no voice)

VD= CMRS and IP Voice Service over Digital Transport

Remark:

- For protocols not listed in Table 6.1 of ANSI C63.19:2019, the average speech level of -20 dBm0 should be used.
- The WLAN6GHz U-NII 6/7/8 were above 6GHz and were not evaluated due to outside of the current scope of ANSI C63.19 and FCC HAC regulations.
- The WLAN6GHz U-NII-5 was evaluated for operations which are entirely below 6 GHz, above 6 GHz were not evaluated due outside of the current scope of ANSI C63.19 and FCC HAC regulations.
- Because features of Google Meet allow the option of voice-only communications, Meet has been tested for HAC/T-Coil compatibility to ensure the best user experience.
- The device have similar frequency in some LTE/5GFR1 bands: LTE B12/17, 5/26, 4/66, 2/25, 38/41, 42(3550MHz~3600MHz)&43/48, and 5GFR1 n2/25, n5/26, n38/41, n77/78, since the supported frequency spans for the smaller LTE/NR bands are completely cover by the larger LTE/NR bands, therefore, only larger LTE/NR bands were required to be tested for hearing-aid compliance.
- The Google Meet and google Fi the audio path, parameter and audio codec are all the same, therefore, the Google Meet is evaluation for this device to show compliance.
- The device has two work states, flip open and flip close, and that support held-to-the-ear mode in open-side positions of a foldable handset only, so flip open

8. mode was performed HAC/T-Coil testing.
The product only 2G/3G/4G/5G support time-average SAR feature, therefore GSM/UMTS/LTE/5GFR1/WIFI HAC were tested at Pmax level(the maximum power).

5. T-Coil coupling mode requirements

5.1 T-Coil coupling qualifying field strengths

When measured as specified in this standard, there are two groups of qualifying measurement points:

Primary group: A qualifying measurement point shall have its T-Coil signal, desired ABM signal, ≥ -18 dB(A/m) at 1 kHz, in a 1/3 octave band filter. These measurements shall be made with the WD operating at a reference input level as specified in Table 6.1. simultaneously, the qualifying measurement point shall have its weighted magnetic noise, undesired ABM field ≤ -38 dB(A/m).

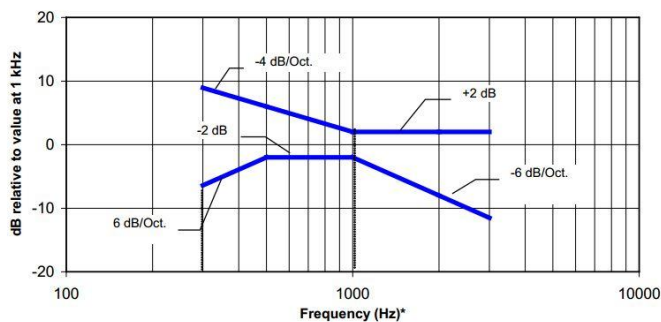
Secondary group: A qualifying measurement point shall have its weighted magnetic noise, undesired ABM field ≤ -38 dB(A/m). This group inherently includes all the members of the primary group.

These levels are designed to be compatible with hearing aids that produce the same acoustic output level for either an acoustic input level of 65 dB SPL or a magnetic input level of -25 dB(A/m) (56.2 mA/m) 39 at either 1.0 kHz or 1.6 kHz. The hearing aid operational measurements are performed per ANSI S3.22-2014

5.2 Frequency Response

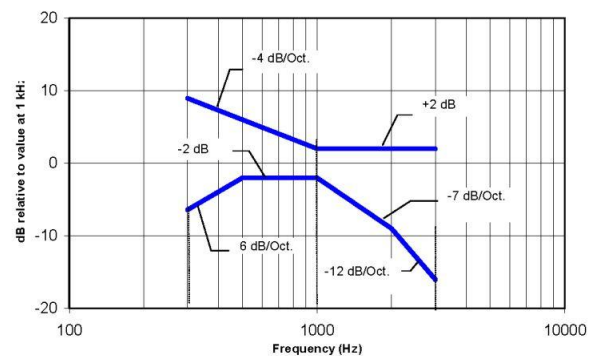
The frequency response of the magnetic field, measured in 1/3 octave bands, shall follow the response curve specified in this subclause, over the frequency range 300 Hz to 3 kHz.

Figure 6.4 and Figure 6.5 provide the boundaries for the specified frequency. These response curves are for true field strength measurements of the T-Coil signal. Thus the 6 dB/octave probe response has been corrected from the raw readings.



NOTE—Frequency response is between 300 Hz and 3 kHz.

Figure 6.4—Magnetic field frequency response for WDs with a maximum field ≤ -15 dB(A/m) at 1 kHz



NOTE—Frequency response is between 300 Hz and 3000 Hz.

Figure 6.5—Magnetic field frequency response for WDs with a maximum field that exceeds -15 dB(A/m) at 1 kHz

5.3 Desired ABM signal, undesired ABM field qualification requirements

<Non-2G GSM operating modes>

The goal of this requirement is to ensure an adequate area where desired ABM signal is sufficiently strong to be heard clearly and a larger area where undesired ABM field is sufficiently low as to avoid undue annoyance. Qualifying measurement points shall fulfill the requirements of ANSI C63.19-2019 section 6.6.2; both the primary and secondary group requirements shall be met:

- The primary group shall include at least 75 measurement points
- The secondary group shall include at least 300 contiguous measurement points

Additionally, to avoid an oddly shaped area of low noise, the secondary group shall include at least one longitudinal column of at least 10 contiguous qualifying points and at least one transverse row containing at least 15 contiguous qualifying points.

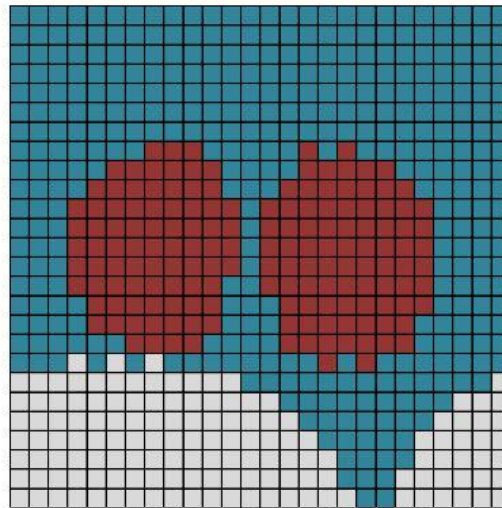
Figure 6.6 is an example of a qualifying scan. The total number of primary group qualifying measurement points is 161, which is ≥ 75 . The total number of secondary group qualifying points is 536, which is ≥ 300

The secondary group has a longitudinal column of 26, which is ≥ 10 , and a transverse row also of 26 contiguous points, which is ≥ 15

<2G GSM operating modes>

If the 2G GSM operating mode(s) are selected for qualification, the qualifying measurement points shall fulfil the requirements of ANSI C63.19-2019 section 6.6.2; both the primary and secondary group requirements shall be met:

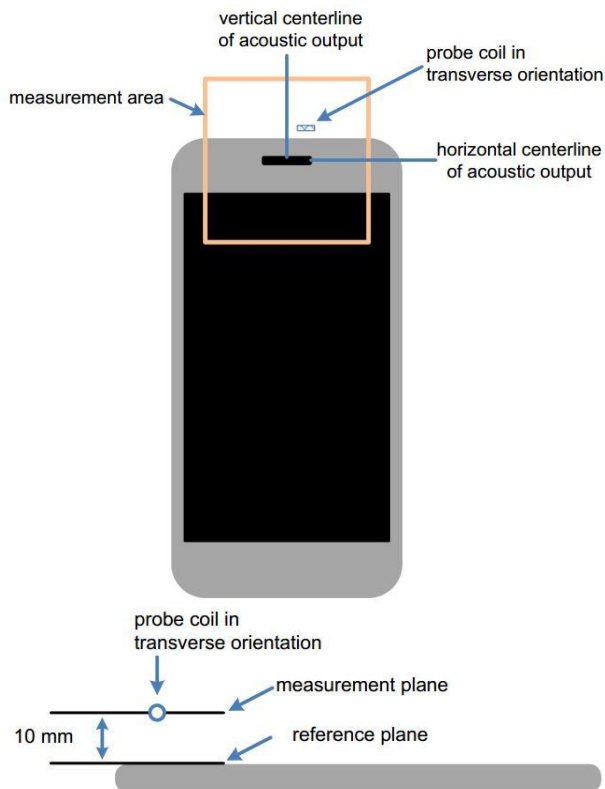
- The primary group shall include at least 25 measurement points
- The secondary group shall include at least 125 contiguous measurement points



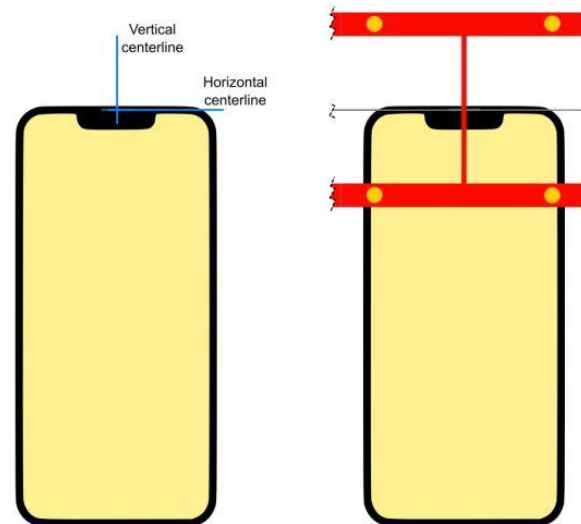
Red (primary group): AB desired ABM signal $M1 \geq -18$ dB(A/m) and undesired ABM field ≤ -38 dB(A/m)
Blue and red (secondary group): undesired ABM field ≤ -38 dB(A/m)

Figure 6.6—An example of a qualifying desired ABM signal, undesired ABM field scan:

5.4 T-Coil measurement and reference plane



Measurement and reference planes probe orientation for WD audio frequency magnetic field measurements



Device Under Test Positioning under the Test Arch

The T-Coil measurement plane, reference plane and other measurement parameters shall be:

- The reference plane is the planar area that contains the highest point in the area of the phone that normally rests against the user's ear. It is parallel to the centerline of the receiver area of the phone and is defined by the points of the receiver-end of the WD handset, which, in normal handset use, rest against the ear.
- The measurement plane is parallel to, and 10 mm in front of, the reference plane.
- The reference axis is normal to the reference plane and passes through the center of the acoustic output (or the center of the hole array); or may be centered on or near a secondary inductive source. The actual location of the reference axis and resultant measurement area shall be noted in the test report.
- The measurement area shall be 50 mm by 50 mm. The measurement area for both desired ABM signal and undesired ABM field may be located where the transverse magnetic measurements are optimum with regard to the requirements. However, the measurement area should be in the vicinity of the acoustic output of the WD and shall be located in the same half of the phone as the WD receiver. In a WD handset with a centered receiver and a circularly symmetrical magnetic field, the measurement axis and the reference axis would coincide.
- Measurements of desired ABM signal strength and undesired ABM field are made at $2.0 \text{ mm} \pm 0.5 \text{ mm}$ or 4 mm intervals in an X-Y measurement area pattern over the entire measurement area (676 measurement points total); either all measured, or measured plus interpolated, per ANSI C63.19-2019 section 6.4
- Desired ABM signal frequency response is measured at a single location at or near the maximum
- desired ABM signal strength location.
- The actual locations of the measurement points shall be noted in the test report.



6. Test procedure for T-Coil signal

This subclause describes the procedures used to measure the ABM (T-Coil) performance of the WD. Measurements shall be performed over a measurement area 50 mm square, in the measurement plane, as specified in ANSI C63.19-2019 A.3. The measurement area shall be scanned with a uniform measurement point spacing of 2.0 mm \pm 0.5 mm in each X-Y axis of the plane, yielding 676 measurement points with approximately even spacing throughout the area

Optionally, measurement point spacing may be increased to 4 mm, with interpolation employed to yield the required 676 equivalent measurement points distributed uniformly over the 50 mm square measurement area. Interpolated points shall be derived from the average of the linear representations of the field strengths of the nearest two or four equidistant measured points. The area of measurement is increased to a 52 mm square so that edge rows and columns of the required 50 mm square can be either measured or interpolated, with none extrapolated.

In addition to measuring the desired ABM signal levels, the weighted magnitude of the unintended signal shall also be determined. Weighting of the unintended and undesired ABM field shall be by the spectral and temporal weighting described in ANSI C63.19-2019 D.4 through D.6

In order to assure that the required signal quality is measured, the measurement of the intended signal and the measurement of the unintended signal shall be made at the same locations. Measurements shall not include undesired influence from the WD's RF field; therefore, use of a coaxial connection to a base station simulator or non-radiating load might be necessary. However, even then with a coaxial connection to a base station simulator or non-radiating load there could still be RF leakage from the WD, which could interfere with the desired measurement. Pre-measurement checks should be made to avoid this possibility. All measurements shall be done with the WD operating on battery power with an appropriate normal speech audio signal input level given in ANSI C63.19-2019 Table 6.1. If the device display can be turned off during a phone call, then that may be done during the measurement as well. If tested with the display in the off state this shall be documented in the test report

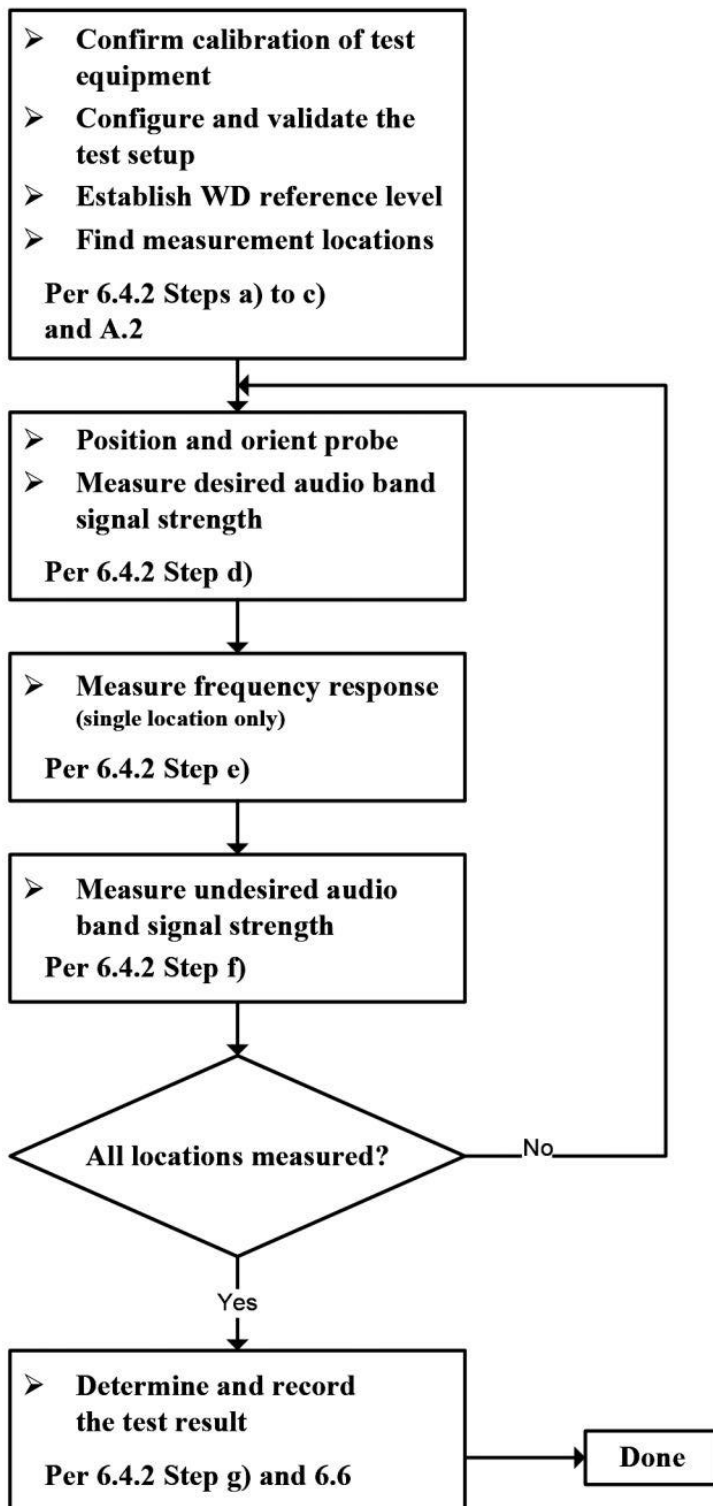
Measurements shall be performed with the probe coil oriented in the transverse direction, as illustrated in ANSI C63.19-2019 A.3, that is, aligned in the plane of the measurement area and perpendicular to the long dimension of the WD. A multi-stage sequence consists of first measuring the field strength of the desired T-Coil signal (desired ABM signal) that is useful to a hearing aid T-Coil at each specified measurement point. The undesired magnetic component (undesired ABM field) is then measured in the same transverse orientation at each of the same measurement points. At a single location only, taken at or near the highest desired ABM signal reading, the desired ABM signal frequency response shall be determined in a third measurement stage. The flowchart in ANSI C63.19-2019 Figure 6.3 illustrates this three-stage process.

To minimize the need to test every WD operating mode to the telecoil requirements of ANSI C63.19-2019 Clause 6, it is permissible to exclude some subset of supported configurations. For a given WD, every mode that supports voice communication shall be considered for telecoil testing. However, if it can be demonstrated that a certain configuration will not be the worst-case telecoil configuration, such configurations may be excluded from the full telecoil scans of ANSI C63.19-2019 section 6.4. 34 For example, operating modes may be pre-screened by scanning for both desired ABM signal and undesired ABM field at a lower measurement point density than the final scans, thus saving considerable testing time by eliminating configurations that are excellent performers from more detailed testing for worst-case. In any case, the specific methods and criteria used to determine which configurations are excluded for a WD shall be explicitly stated and justified in the test report. To be considered for exclusion from telecoil testing, operating modes shall also be shown to pass the frequency response requirements of ANSI C63.19-2019 section 6.6.3.

Many factors could affect telecoil test results. RF power level and amplitude modulation characteristics as well as the specific current paths within the WD associated with the RF output stage(s), the display, and processing circuitry could affect the undesired ABM field. Audio codec implementation and acoustic receiver characteristics could also affect the desired ABM signal). Therefore, any justifications for exclusions should be thorough documented. If an operating mode is under user control and instructions on how to place the WD in a less interfering condition is in the user instructions, those instructions may be followed in configuring the device for testing

Test flow for T-Coil signal test

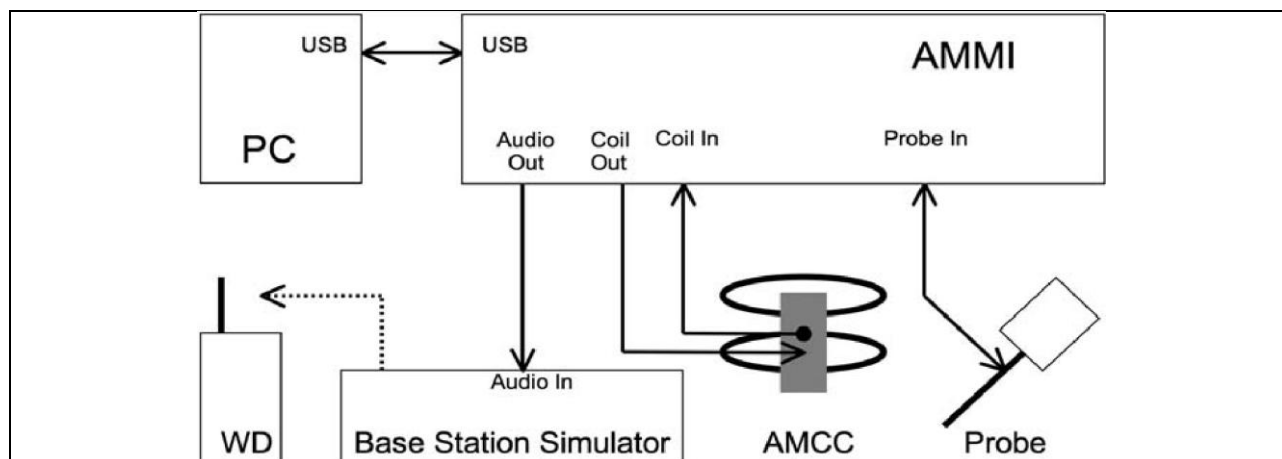
Test Instructions





The following steps summarize the basic test flow for determining desired ABM signal and undesired ABM field. These steps assume that a sine wave or narrowband 1/3 octave signal can be used for the measurement of desired ABM signal level. An alternative procedure, yielding equivalent results, using a broadband excitation is described in ANSI C63.19-2019 section 6.5.

- a. A validation of the test setup and instrumentation shall be performed. This may be done using a TMFS or Helmholtz Coil. Measure the emissions and confirm that they are within tolerance of the expected values.
- b. Confirm that equipment that requires calibration has been calibrated, and that the noise level meets the requirements given in ANSI C63.19-2019 section 6.3.2.
- c. Position the WD in the test setup and connect the WD RF connector to a base station simulator or a non-radiating load (if necessary to control RF interference in the measurement equipment) as shown in section 6.1 or section 6.2.
- d. The drive level to the WD is set such that the reference input level specified in ANSI C63.19-2019 Table 6.1 is input to the base station simulator (or manufacturer's test mode equivalent) in the 1 kHz, 1/3 octave band. This drive level shall be used for the T-Coil signal test (desired ABM signal) at $f = 1$ kHz. Either a sine wave at 1025 Hz, or a voice-like signal, band-limited to the 1 kHz 1/3 octave, as specified in 6.4.3, shall be used for the reference audio signal. If interference is found at 1025 Hz an alternative nearby reference audio signal frequency may be used. 35 The same drive level will be used for the desired ABM signal frequency response measurements at each 1/3 octave band center frequency. The WD volume control may be set at any level up to maximum, provided that a signal at any frequency at maximum modulation would not result in clipping or signal overload.
- e. At each measurement location over the measurement area and in the transverse orientation, measure and record the desired 1 kHz T-Coil magnetic signal (desired ABM signal) as described in Step c).
- f. At or near a location representing a maximum in the just-measured desired ABM signal, measure and record the desired T-Coil magnetic signals (desired ABM signal at f_i) as described in ANSI C63.19-2019 section 6.4.5.2 in each individual ISO 266:1975 R10 standard 1/3 octave band. The desired audio band input frequency (f_i) shall be centered in each 1/3 octave band maintaining the same drive level as determined in Step c), and the reading taken for that band. Equivalent methods of determining the frequency response may also be employed, such as fast Fourier transform (FFT) analysis using noise excitation or input-output comparison using simulated speech. The full-band integrated or half-band integrated probe output, as described in ANSI C63.19-2019 D.9, may be used, as long as the appropriate calibration curve is applied to the measured result, so as to yield an accurate measurement of the field magnitude. (The resulting measurement shall be an accurate measurement in dB(A/m).) Compare the frequency response found to the requirements of ANSI C63.19-2019 section 6.6.3.
- g. At the same locations measured in Step d), measure and record the undesired broadband audio magnetic signal (undesired ABM field) with no audio signal applied (or digital zero applied, if appropriate) using the specified spectral weighting, the half-band integrator followed by the temporal weighting.
- h. Calculate and record the location and number of the measurement points that satisfy both the minimum desired ABM signal level and the maximum undesired ABM field level specified in ANSI C63.19-2019 section 6.6.2. Compare this to the requirements in ANSI C63.19-2019 section 6.6.4 and record the result.
- i. Calculate and record the location and number of the measurement points that satisfy the maximum undesired ABM field level and distribution requirements specified in ANSI C63.19-2019 section 6.6.4.

Test Setup Diagram for GSM/UMTS/VoLTE/VoWiFi/VoNR

General Note:

- Define the all applicable input audio level as below according to ANSI C63.19-2019 table 6.1:
 - GSM input level: -16dBm0
 - UMTS input level: -16dBm0
 - VoLTE input level: -16dBm0
 - VoNR input level: -16dBm0
 - VoWiFi input level: -16dBm0
- The test setup used for GSM/UMTS is via the callbox of CMW500 for T-coil measurement. The CMW500 input is calibrated and the relation between the analog input voltage and the internal level in dBm0 can be determined. The CMW500 can be manually configured to control the speech input level and ensure that the result is -16dBm0 for GSM/UMTS CMRS Voice connection.
- Voice over Long-Term Evolution (VoLTE) is a standard for high-speed wireless communication for mobile phones and data terminals — including IoT devices and wearables. It is based on the IP Multimedia Subsystem (IMS) network, with specific profiles for control and media planes of voice service on LTE defined by GSMA in PRD IR.92. This approach results in the voice service (control and media planes) being delivered as data flows within the LTE data bearer. This means that there is no dependency on the legacy circuit-switched voice network to be maintained.
- The test setup used for VoLTE and VoWiFi over IMS is via the callbox of CMW500 for T-coil measurement. The data application unit of the CMW500 is used to simulate the IP multimedia subsystem server. The CMW500 can be manually configured to control the speech input level and ensure that the result is -16dBm0 for VoLTE, and VoWiFi during the IMS connection.
- The test setup used for VoNR over IMS is via the callbox of CMX500 for T-coil measurement. The data application unit of the CMX500 was used to simulate the IP multimedia subsystem server. The CMW500 can be manually configured to ensure and control the speech input level result is -16dBm0 for VoNR when the device during the IMS connection.
- According to KDB 285076 D02, T-Coil testing for VoLTE, VoNR and VoWiFi requires test instrumentation that can (1) for the system to be able to establish an IP call from/to the handset under test, (2) through an IMS (IP Multimedia Subsystem) and SIP/IP server, (3) to an analog audio adapter containing the permissible set of codecs used by the device under test, and (4) inject the necessary C63.19 test tones at the average speech level for the measurement. The test setup is illustrated above Figure. The R&S CMW500 and CMX500 was used as system simulator for VoLTE, VoNR and VoWiFi T-Coil testing. The DAU (Data Application Unit) in CMW500, CMX500 integrates IMS and SIP/IP server that can establish VoLTE, VoNR and Wi-Fi calling, and transport the test tones from AMMI (Audio Magnetic Measuring Instrument) to EUT.

<Example define the input level for GSM/UMTS/VoLTE/VoNR/VoWiFi>

Gain Value	dBm0	Full scal Voltage	dB	AMMI audio out dBv (RMS)	AMCC Coil Out (dBv (RMS))
	3.14	1.5		0.51	
100	5.57		40	2.94	3.09
8.35	-16		18.43		-18.48
Signal Type	Duration (s)	Peak to RMS (dB)	RMS (dB)	Gain Factor	Gain Setting
1kHz sine	-	3	0	1	8.35
48k_voice_1kHz	1	16.2	-12.7	4.33	36.15
48k_voice_300-3000	2	21.6	-18.6	8.48	70.79

**7. Test Equipment List**

Manufacturer	Name of Equipment	Type/Model	Serial Number	Calibration	
				Last Cal.	Due Date
SPEAG	Audio Magnetic 1D Field Probe	AM1DV3	3130	2024/8/15	2025/8/14
SPEAG	Data Acquisition Electronics	DAE4	1338	2025/3/18	2026/3/17
SPEAG	Audio Magnetic Calibration Coil	AMCC	1049	NCR	NCR
SPEAG	Audio Measuring Instrument	AMMI	1041	NCR	NCR
Testo	Thermo-Hygrometer	HTC-1	55011	2025/1/3	2026/1/2
R&S	Base Station	CMW500	143030	2024/7/4	2025/7/3
SPEAG	Test Arch Phantom	N/A	N/A	NCR	NCR
SPEAG	Phone Positioner	N/A	N/A	NCR	NCR

Note:

1. NCR: "No-Calibration Required"

**8. T-Coil testing for CMRS Voice****8.1 GSM Evaluation Results****<Air Interface Investigation>**

Plot No.	Air Interface	Modulation / Mode	Channel	Probe Position	Primary Group Contiguous Point Count	Secondary Group Contiguous Point Count	Secondary Group Max Longitudinal	Secondary Group Max Transverse	Frequency Response Margin (dB)	Note	Ambient Noise dB (A/m)
01	GSM850	Voice	189	Transversal (Y)	27	264	12	26	0.34	Main PA	-50.18

Remark:

1. Phone Condition: Mute on; Backlight off; Max Volume
2. Hearing Aid mode (Phone -> Setting ->Accessibility->Hearing aids) was set to on for improving the audio signal performance for HAC T-Coil compliance.

Test Engineer : Martin Li

9. Uncertainty Assessment

The evaluation of uncertainty by the statistical analysis of a series of observations is termed a Type A evaluation of uncertainty. The evaluation of uncertainty by means other than the statistical analysis of a series of observation is termed a Type B evaluation of uncertainty. Each component of uncertainty, however evaluated, is represented by an estimated standard deviation, termed standard uncertainty, which is determined by the positive square root of the estimated variance. The combined standard uncertainty of the measurement result represents the estimated standard deviation of the result. It is obtained by combining the individual standard uncertainties of both Type A and Type B evaluation using the usual "root-sum-squares" (RSS) methods of combining standard deviations by taking the positive square root of the estimated variances. Expanded uncertainty is a measure of uncertainty that defines an interval about the measurement result within which the measured value is confidently believed to lie. It is obtained by multiplying the combined standard uncertainty by a coverage factor. For purpose of this document, a coverage factor two is used, which corresponds to confidence interval of about 95 %. The DASY uncertainty Budget is showed in Table 8.2.

The judgment of conformity in the report is based on the measurement results excluding the measurement uncertainty.

Error Description	Uncertainty Value (±%)	Probability Distribution	Divisor	Ci (ABMd)	Ci (ABMu)	Standard Uncertainty (ABMd) (±%)	Standard Uncertainty (ABMu) (±%)
Probe Sensitivity							
Reference Level	3.0	Normal	1	1	1	3.0	3.0
AMCC Geometry	0.4	Rectangular	$\sqrt{3}$	1	1	0.2	0.2
AMCC Current	1.0	Rectangular	$\sqrt{3}$	1	1	0.6	0.6
Probe Positioning During Calibrate	0.1	Rectangular	$\sqrt{3}$	1	1	0.1	0.1
Noise Contribution	0.7	Rectangular	$\sqrt{3}$	0.0143	1	0.0	0.4
Frequency Slope	5.9	Rectangular	$\sqrt{3}$	0.1	1	0.3	3.4
Probe System							
Repeatability / Drift	1.0	Rectangular	$\sqrt{3}$	1	1	0.6	0.6
Linearity / Dynamic Range	0.6	Rectangular	$\sqrt{3}$	1	1	0.3	0.3
Acoustic Noise	1.0	Rectangular	$\sqrt{3}$	0.1	1	0.1	0.6
Probe Angle	1.0	Rectangular	$\sqrt{3}$	1	1	0.6	0.6
Spectral Processing	0.9	Rectangular	$\sqrt{3}$	1	1	0.5	0.5
Integration Time	0.6	Normal	1	1	5	0.6	3.0
Field Disturbation	0.2	Rectangular	$\sqrt{3}$	1	1	0.1	0.1
Test Signal							
Reference Signal Spectral Response	0.6	Rectangular	$\sqrt{3}$	0.0	0.3	0.0	0.3
Positioning							
Probe Positioning	1.9	Rectangular	$\sqrt{3}$	1	1	1.1	1.1
Phantom Thickness	0.9	Rectangular	$\sqrt{3}$	1	1	0.5	0.5
EUT Positioning	1.9	Rectangular	$\sqrt{3}$	1	1	1.1	1.1
External Contributions							
RF Interference	0.0	Rectangular	$\sqrt{3}$	1	0.3	0.0	0.0
Test Signal Variation	2.0	Rectangular	$\sqrt{3}$	1	1	1.2	1.2
Combined Standard Uncertainty						3.9%	6.0%
Coverage Factor for 95 %						K = 2	
Expanded Uncertainty						7.7 %	11.9 %
Declaration of Conformity: The test results with all measurement uncertainty excluded are presented in accordance with the regulation limits or requirements declared by manufacturers.							
Comments and Explanations: The declared of product specification for EUT presented in the report are provided by the manufacturer, and the manufacturer takes all the responsibilities for the accuracy of product specification.							

Uncertainty Budget of audio band magnetic measurement



10. References

- [1] ANSI C63.19-2019, "American National Standard for Methods of Measurement of Compatibility between Wireless Communications Devices and Hearing Aids", Aug. 2019.
- [2] FCC KDB 285076 D01v06r04, "Equipment Authorization Guidance for Hearing Aid Compatibility", Sep. 2023.
- [3] FCC KDB 285076 D02v04, "Guidance for performing T-Coil tests for air interfaces supporting voice over IP (e.g., LTE and WiFi) to support CMRS based telephone services", Feb 2022
- [4] FCC KDB 285076 D03v01r07, "Hearing aid compatibility frequently asked questions", Dec. 2024
- [5] SPEAG DASY System Handbook

Appendixes

Please refer to separated files for the following appendixes

Appendix A. Plots of T-Coil Measurement

Appendix B. DASY Calibration Certificate

Appendix C. Test Setup Photos

-----THE END-----