

Test Report 2024-099

Version A

Issued 27 Jun 2024

Project: GCL-0463

Model Identifier: A04884

Primary Test Standard(s):

CFR 47, FCC Part 15.247

RSS-247 Issue 3

Garmin Compliance Lab

Garmin International

1200 E 151st Street

Olathe Kansas 66062 USA

Client-supplied Information

FCC ID: IPH-04884
IC ID: 1792A-04884



See section 6 of this report regarding the presence or absence of accreditation logos or marks on this cover page.

1. Summary

The equipment or product described in section 5 of this report was tested at the Garmin Compliance Lab according to standards listed in section 6. This report focuses on the 2.4 GHz Bluetooth Low Energy (BLE) transceiver(s). Test records within this report may include data for the ANT transmitter, but ANT is addressed in a separate report. The results are as follows.

Parameter	Description	Key Performance Values	Result	Data starts at page
Radio Modulation	Summary of the kinds of communication this radio can achieve, as stated by the client. [RSS-GEN at Annex A item 10b]	Digitally modulated spread spectrum at rates as high as 2 Mbps.	Reported	N/A
Hopping Channels	The radio manages its use of channels appropriately. [15.247(a)(1); RSS-247 at 5.1]	N/A. The radios described in this report are not subjected to the Frequency Hopping rules.	N/A	N/A
DTS Bandwidth	The nature of the radio signal is broadband, being at least 500 kHz wide. [15.247(a)(2); RSS-247 at 5.2(a)]	The 6dB bandwidth is 714 kHz or greater.	PASS	12
Other Bandwidths	Regulatory agencies also require the reporting of signal bandwidths using alternate processes. [2.202; RSS-GEN at 6.7]	These values are reported but have no actual performance requirements.	Reported	15
Transmit Power	The peak transmit power presented to the antenna is no greater than 1 Watt or 30 dBm. The effective radiated power is limited to 4 Watts or 36 dBm EIRP. [15.247(b); RSS-247 at 5.4(d)]	The maximum transmit power is 2.93 dBm or 1.96 mW.	PASS	20
Antenna Gain	The radio should not focus too much energy in any direction. Unless additional rules are applied, the antenna gain is no greater than 6 dBi. [15.247(b)(4) and (c)]	NT. The client stated that the antenna gain was 2.8 dBi and will document antenna gain separately.	NT	NT
Unwanted Emissions (Conducted Spurious)	The radio should not provide too much radio energy to the antenna at frequencies beyond its intended frequency band. [15.247(d); RSS-247 at 5.5]	Emissions outside the band must be reduced at least 20 dB from in-band levels. The measured reduction was at least 39.67 dB.	PASS	23
Restricted Bands	The radio must not emit in certain designated restricted frequency bands above a set of limit values. [15.247(d) and 15.205; RSS-247 at 3.3]	Emissions in the restricted bands were at least 12 dB below the applicable limits.	PASS	27
Power Spectral Density	The radio must not focus too much radio energy in a narrow frequency band. [15.247(e); RSS-247 at 5.2(b)]	The limit is 8 dBm in a 3 kHz band. The strongest emission level was -12.22 dBm in a band of at least 3 kHz.	PASS	32
Hybrid Systems	A radio that is both frequency hopping and digitally modulated should satisfy a combination of system rules. [15.247(f); RSS-247 at 5.3]	N/A. The radios described in this report are not subjected to the Hybrid System rules.	N/A	N/A

Frequency Hopping Rules	Frequency hopping systems have additional functional requirements. [15.247(g) and (h); RSS-247 at 5.1]	N/A. The radios described in this report are not subjected to the Frequency Hopping rules.	N/A	N/A
Radio Safety	The radio emissions must meet public health & safety guidelines related to human exposure. [15.247(i) and 1.1307; RSS-Gen at 3.4]	NT. Client will report radio energy safety results separately.	NT	NT
Frequency Stability	The radio tuning must be robust over a range of temperature and supply voltage conditions. [RSS-Gen at 6.11]	Radio emissions remained within the allowed radio band under all environmental conditions tested.	PASS	34
Unwanted Emissions (Radiated Spurious)	While transmitting, the radiated emissions must not be too strong. [15.209, RSS-Gen at 8.9]	Emissions other than the fundamental and harmonics must meet the 'Class B' limits. The measured emissions had at least 8.9 dB of margin.	PASS	42
Unwanted Emissions (Mains Conducted)	While transmitting, the emissions conducted into the power mains must not be too strong. [15.207, RSS-Gen at 8.8]	Emissions other than the fundamental and harmonics must meet the 'Class B' limits. The measured emissions had at least 29.64 dB of margin.	PASS	45

NT (Not Tested) means the requirement may or may not be applicable, but the relevant measurement or test was not performed as part of this test project.

N/A (Not Applicable) means the lab judged that the test sample is exempt from the requirement.

Table 1: Summary of results

Report Organization

For convenience of the reader, this report is organized as follows:

1. Summary
2. Test Background
3. Report History and Approval
4. Test Sample Modifications and Special Conditions
5. Description of Equipment Tested
6. Test Standards Applied
7. Measurement Instrumentation Uncertainty
8. Selected Examples of Calculations
9. Environmental Conditions During Test
10. Immunity Performance Criteria

Annex: Test records are provided for each type of test, following the order and page numbering stated in the summary table. Concluding notes appear on the final page of this report.

Due to confidentiality, certain material (such as test setup photographs) has been removed from this report and placed in GCL Test Report 2024-105. That report is treated as a part of this document by way of this reference.

2. Test Background

2.1 The Test Lab

The testing reported here was performed at the Garmin Compliance Lab, an organization within Garmin International, located at 1200 E 151st St, Olathe Kansas, USA. The contact telephone number is +1.913.397.8200.

2.2 The Client

The testing was performed on behalf of the Garmin design group, a separate organization located at 1200 E 151st St, Olathe Kansas, USA. Witnesses from the business group included: None.

2.3 Other Information

Test Sample received: 01 May 2024
Test Start Date: 08 May 2024
Test End Date: 17 Jun 2024

The data in this test report apply only to the specific samples tested.

Upon receipt all test samples were believed to be properly assembled and ready for testing.

3. Report History and Approval

This report was written by Andy Heier and initially issued on 27 Jun 2024 as Version A.

Report Technical Review:

David Arnett
Technical Lead EMC Engineer



Report Approval:

Shruti Kohli
Manager Test and Measurement (EMC, Reliability and Calibration)



4. Test Sample Modifications and Special Conditions

The following special conditions or usage attributes were judged during test to be necessary to achieve compliance with one or more of the standards listed in section 6 of this report:

None

The following modifications to the test sample(s) were made, and are judged necessary to achieve compliance with one or more of the standards listed in section 6 of this report:

None

5. Description of the Equipment Tested

5.1 Unique Identification

Product Model A04884
Serial Numbers Tested 8LY000163, 8LY000159

This product tested is a mobile device for collecting and sharing data with the user and nearby electronic devices.

The client affirmed that the test samples will be representative of production in all relevant aspects.

5.2 Key Parameters

EUT Input Power: 5 Vdc
I/O Ports: USB
Radio Transceivers: Bluetooth Low Energy, ANT, NFC
Radio Receivers: GPS L1, GPS L5, Galileo E1, Galileo E5a/b, BeiDou, GLONASS
Primary Functions: Data collection and communication
Typical use: Portable in multiple orientations
Highest internal frequency: 2.484 GHz
Firmware Revision 2.04

5.3 Operating modes

During test, the EUT was operated in one or more of the following modes.

Mode 3: M3 (BleTx). Bluetooth Low Energy radio transmitting consistently on a selected channel at 1 Mbps or 2 Mbps.

Mode 4: M4 (BleLnk). Bluetooth Low Energy radio is paired to a companion device, transmitting and receiving data on various channels in accordance with the protocol, and maintaining the paired relationship.

Mode 5: M5 (AntTx). ANT radio transmitting consistently on a selected channel.

Mode 6: M6 (AntLnk). ANT radio is paired to a companion device, transmitting and receiving data in accordance with the protocol, and maintaining the paired relationship.

Mode 9: M9 (RxBtBIA). The radio was set to receive 2.4 GHz signals but not transmitting in Bluetooth, Bluetooth low energy or ANT.

Mode 12: M12 (NfcRdr). The NFC radio was transmitting and actively linked to a NFC Card Reader.

Mode 13: M13 (GNSS). The Global Navigation Satellite System receiver is monitoring the GNSS bands, attempting to detect a constellation and determine location. Unless otherwise noted, the EUT was provided simulated GNSS signals representing one of more constellation types. In addition, the EUT may have been reporting signal levels and satellite data to an attached computer to monitor link health.

Mode 14: M14 (NfcIdle). The NFC Radio was powered, but not transmitting or linked to any devices.

Mode 16: M16 (NfcTag). The NFC radio was transmitting and actively linked to a passive NFC tag.

Mode 19: M19 (ML1). Multiple link, combining modes M4 & M6. The EUT is actively paired to both a BLE and an ANT companion device, used for Immunity tests.

Mode 20: M20 (ML2). Multiple link, combining modes M12 & M13. The EUT is actively linked to a NFC card reader and the specified satellite system, used for immunity tests.

5.4 EUT Arrangement

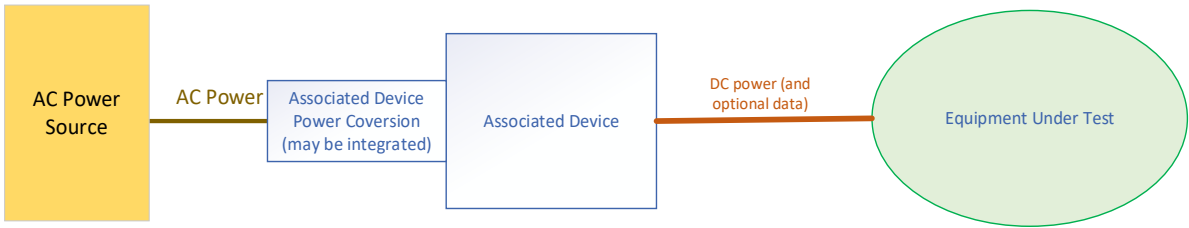
During test, the EUT components and associated support equipment were selected including the following arrangement sets.

Arrangement 1: A1 (Solo). The test sample operates from its battery and no external physical connections. No block diagram is needed for this arrangement.

Arrangement 2: A2 (Upwr). The test sample is attached to a Mains-powered device connected that provides dc power to the sample over a cable but no user data. See the block diagram in Figure 1.

Arrangement 3: A3 (Udata). The test sample is attached to a Mains-powered device connected that provides dc power to the sample and user data over a cable. See the block diagram in Figure 1.

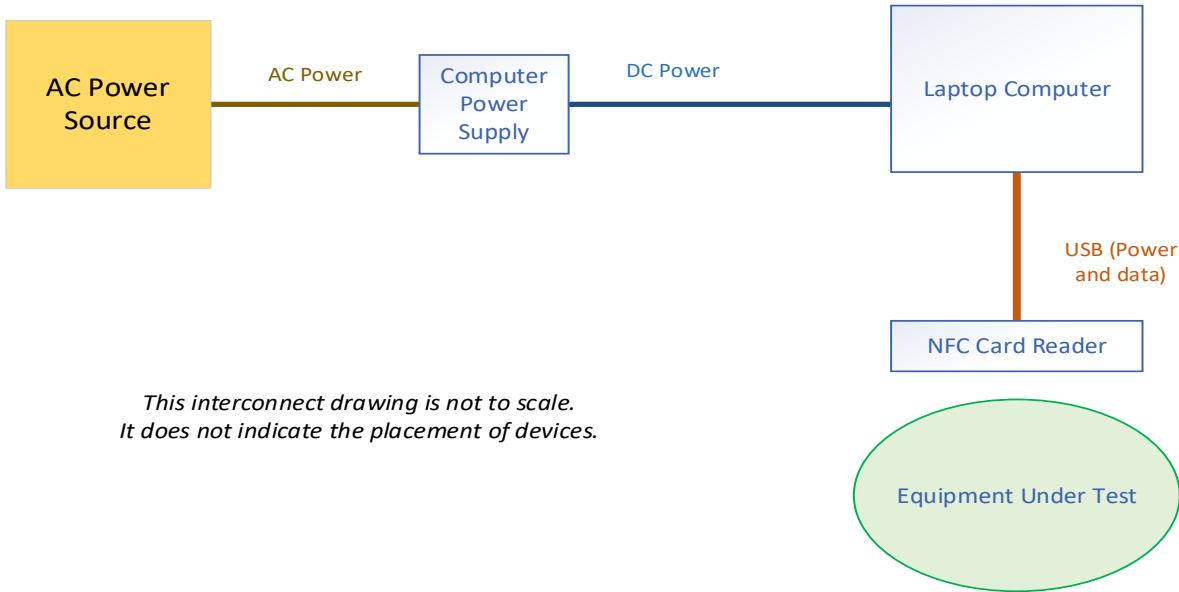
Arrangement 4: A4 (Udc). The test sample is attached to a Mains-powered device connected that provides dc power to the sample and may or may not provide user data. This arrangement is specified in the test plan to provide staff flexibility when the presence or absence of data on the cable is not pertinent. See the block diagram in Figure 1.



*This interconnect drawing is not to scale.
It does not indicate the placement of devices.*

Figure 1: Block diagram of equipment arrangements A2, A3, A4

Arrangement 6: A6 (NFCu). The test sample is powered via internal battery and actively linked to a NCR reader powered by a laptop PC.



*This interconnect drawing is not to scale.
It does not indicate the placement of devices.*

Figure 2: Block diagram of equipment arrangement A6

Arrangement 7: A7 (NFCu). The test sample is powered via internal battery and actively linked to a passive NFC tag.

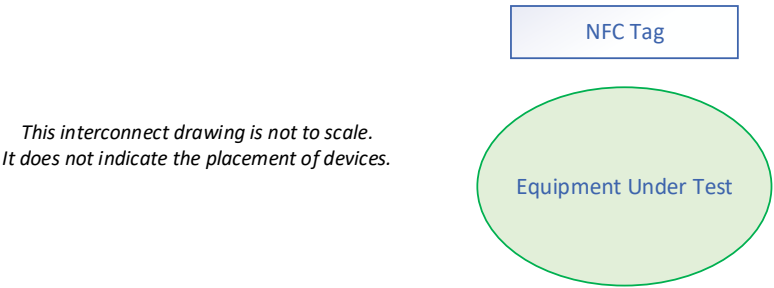


Figure 2: Block diagram of equipment arrangement A6

5.5 Associated Equipment (AE) used

Description	Manufacturer	Model	Serial/Part Number
USB C power adaptor	Phihong (Garmin)	AQ27A-59CFA	362-00118-00
Tablet	Apple	iPad Pro 11 inch	DMPZ7582KD6L
Laptop	Dell	Latitude 5410	5VSPFB3
Power Supply	Dell	HA65NM191	0BD-7TC0-A02
Phone	Samsung	SM-G973U (S10)	RF8MC0W9XVR
NFC Card Reader	ACS	ACR1252U-M1	RR554-118449
NFC Tag	SANPOPO	NTAG215	PD-STICKER-B-30

Table 2: List of associated equipment that may have been used during test

5.6 Cables used

Description	From	To	Length	EMC Treatment
USB C to custom cable	Power and/or Data source	EUT	0.5m	none

Table 3: List of cables that may have been used during test

6 Test Standards Applied

6.1. Accredited Standards

The following test or measurement standards were applied and are within the scope of the lab's accreditation. All results in this report that cite these standards are presented as Accredited results consistent with ISO/IEC 17025.

CFR 47, FCC Part 15, Subpart C 15.247

ANSI C63.10: 2013, ANSI C63.10: 2020, and ANSI C63.10: 2020 +Cor 1: 2023

AS/NZS 4268: 2017

RSS-GEN Issue 5 Amd 2

RSS-247 Issue 3

6.2. Non-accredited Standards

The following test or measurement standards were applied and are either outside the scope of the lab's accreditation, or were performed in such a way that results are not presented as being fully accredited.

None.

6.3 Variances

The following variances were applied to standards cited in this section.

Where different test standards cover the same test parameter or phenomenon, and the standards have compatible differences, the stricter of the requirements is typically applied. For example, a consolidated limit may be applied to emission tests selecting the strictest of the limits at each frequency. Likewise, if one standard requires a vertical antenna sweep with bore sighting and another does not, swept motion with bore sighting will typically be used as it is the more stringent requirement.

6.4 Laboratory Accreditation

The Garmin Compliance Lab, an organization within Garmin International, is registered with the US Federal Communication Commission as US1311. The lab is recognized by the Canada Department of Innovation, Science, and Economic Development (ISED) under CAB identifier US0233.

The Garmin Compliance Lab, an organization within Garmin International, is accredited by A2LA, Certificate No. 6162.01. The presence of the A2LA logo on the cover of this report indicates this is an accredited ISO/IEC 17025 test report. If the logo is absent, this report is not issued as an accredited report. Other marks and symbols adjacent to the A2LA logo are accreditation co-operations of which A2LA is a member under a mutual recognition agreement, and to which the Garmin Compliance Lab has been sublicensed.

7 Measurement Instrumentation Uncertainty

The lab has analyzed the sources of measurement instrumentation uncertainty. The analysis concludes that the actual measurement values cited in this report are accurate within the U_{LAB} intervals shown below with approximately 95% statistical confidence. Where the report shows a judgment that a test sample passes a test against a published limit based on these measured values, that judgment has a statistical confidence of 97.5% or greater. Measurement Instrumentation Uncertainty is one component of over-all measurement uncertainty, and other uncertainty components are not considered as part of this analysis.

The primary benchmark for measurement instrumentation uncertainty (MIU) in an electromagnetic compatibility (EMC) test lab is the set of U_{CISPR} values published in CISPR 16-4-2. In all cases where a U_{CISPR} value is published by CISPR, the analysis shows that U_{LAB} – this lab's estimated MIU – is better than the U_{CISPR} benchmark.

The secondary benchmark for MIU in an EMC lab performing radio transceiver tests is a set of uncertainty limit values published in various ETSI standards. In this report, U_{ETSI} is the most restrictive of the values found in the ETSI EN standards listed in section 5 of this report. The analysis principles are described in the ETSI TR documents listed there. In most cases U_{LAB} is better than the U_{ETSI} benchmark. Where U_{LAB} exceeds the U_{ETSI} benchmark cited here, that entry is preceded by an asterisk. When required by the ETSI EN standards, excess uncertainty will be added to the measurand before comparison to a limit. In an individual test report, staff may re-evaluate that excess uncertainty based on the uncertainty of the method used and the uncertainty limits of the actual ETSI EN standard being applied, and the revised uncertainty values will be shown in the test report.

Some measurement uncertainties analyzed and reported here are not addressed in CISPR 16-4-2 or the ETSI standards, as indicated by the entry 'None.'

Test Type	U_{LAB}	U_{CISPR}	U_{ETSI}
Conducted DC voltage	0.09% + 2 x LSDPV	None	1%
Conducted AC voltage below 500 Hz	1.0% + 3 x LSDPV	None	2%
Conducted Emissions, Mains Voltage	0.10% + 10 mV	None	None
Conducted Emissions, Mains Current	0.10% + 3 mA	None	None
Conducted Emissions, Mains Power	0.15% + 100 mW	None	None
Conducted Emissions, Power Mains, 9 kHz to 150 kHz	1.49 dB	3.8 dB	None
Conducted Emissions, Power Mains, 150 kHz to 30 MHz	1.40 dB	3.4 dB	None
Conducted Emissions, Cat 6 LCL, 150 kHz to 30 MHz	2.80dB	5 dB	None
Conducted Emissions, Cat 5 LCL, 150 kHz to 30 MHz	3.21 dB	5 dB	None
Conducted Emissions, Cat 3 LCL, 150 kHz to 30 MHz	4.24 dB	5 dB	None
Radiated Emissions, below 30 MHz	0.88 dB	None	6 dB
Radiated Emissions, 30 MHz to 1000 MHz	2.77 dB	6.3 dB	6 dB
Radiated Emissions, 1 GHz to 18 GHz	2.60 dB	5.2 & 5.5 dB	6 dB
Radiated Emissions, 18 GHz to 26.5 GHz	2.73 dB	None	6 dB
*Radio Signal Frequency Accuracy	$*1.55 \times 10^{-7}$	None	1.0×10^{-7}
Radio Signal Occupied Bandwidth	0.95%	None	5%
Radio Power or Power Spectral Density	0.98 dB	None	1 dB
Temperature	0.38 °C	None	1 °C
Barometric Pressure	0.38 kPa	None	None
Relative Humidity	2.85% RH	None	±5% RH
Signal Timing	The greater of these three...	None	None
	0.01% of value		
	0.5 x LSDPV		

Note: LSDPV stands for the Least Significant Digit Place Value reported. In the value 1470 msec, the least significant digit is the 7. It has a 10 msec place value. The LSDPV is thus 10 msec and the maximum error due to roundoff would be 5 msec. If the time value were reported as 1470 msec, the underscore indicates that the 0 is a significant figure and the error due to roundoff would be 0.5 msec. All digits provided to the right of a decimal point radix are significant.

8 Selected Example Calculations

Certain regulators require samples of the calculations that lead from the raw measurement to the final result for AC Mains conducted and unintended radiated emissions. The assumption is that the lab performs raw measurements, then adds, subtracts, multiplies, or divides based on transducer factors, amplifier gains, and losses in the signal transmission path. In this lab, our CISPR 16 Receiver does not work that way. The calibration factors and losses and gains are provided to the receiver as detailed data files. These factors are applied in the RF measurement path prior to the detector. But as a step in the lab measurement process, staff frequently verify that these factors are applied correctly. They make a measurement with the factors applied inside the receiver, then they disable the factors and remeasure the result manually adding in the various relevant factors.

The transmission loss is measured including the combined losses and gains of preamplifiers, cables, and any band-selective filters. In many cases above 1 GHz it is a negative value, indicating that the preamplifier gain is greater than these other losses.

Here are examples of these calculations. The data in these examples was not taken as part of this project:

8.1 AC Mains conducted emissions at 22 MHz

(Raw measurement) + (AMN factor) + (transmission loss) = Result

(7.145 dBuV) + (9.812 dB) + (0.216 dB) = 17.173 dBuV

8.2 Radiated Emissions at 630 MHz

(Raw measurement) + (Antenna factor) + (transmission loss) = Result

(2.25 dBuV) + (27.80 dB/m) + (2.89 dB) = 32.94 dBuV/m

8.3 Radiated Emissions at 2.7 GHz

(Raw measurement) + (Antenna factor) + (transmission loss) = Result

(43.72 dBuV) + (32.22 dB/m) + (-36.09 dB) = 39.85 dBuV/m

9 Environmental Conditions During Test

Environmental conditions in the test lab were monitored during the test period. Temperature and humidity are controlled by an air handling system. As information to the reader, the conditions were observed at the values or within the ranges noted below. For any tests where environmental conditions are critical to test results and require further constraints or details, the test records in the annex may provide more specific information.

Temperature:	20.7 to 22.7 °C
Relative Humidity:	42% to 53% (non-condensing)
Barometric Pressure	96.2 to 98.6 kPa

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
Barometer	Traceable	6453	221702700	3-Aug-2022	1-Aug-2024

Table 4: Environmental monitoring device

10 Immunity Performance Criteria

If this report includes immunity tests then results have been categorized as Performance Criteria A, B, C, or D. The standards that the lab applied will define the details for A, B, and C, as well as which criterion is required for each type of test. They will also define the electrical stresses that were applied during each test. In a very general sense the observed criteria noted in this report are as follows:

Criterion A. The stress applied did not alter product operation. This criterion is generally used for ‘continuous’ stresses that can be present for a long time in the places the product will be used, or that can appear often, even though they may come and go over time.

Criterion B. The stress applied altered product operation, but the product self-recovered so that the user would not have to try to figure out how to restore it to full operation. This criterion is generally used for ‘transient’ stresses that appear briefly and occasionally, but are usually not present in the places the product will be used.

Criterion C. The stress applied altered product operation, but the user could restore it to full operation, for example by power cycling the product. This criterion is generally used for ‘transient’ stresses that appear briefly and only rarely in the places the product will be used.

Criterion D. This is not an official criterion in the standards, because it would be a failure of the requirements. This indication in a test record means the product was affected in a way that the user might not be able to correct. The effect could include some degree of hardware damage, or it could include loss of program files or data files necessary for operation.

Repeatability is an issue in all EMC immunity work. When the product operation changes unexpectedly during a test, and the change would fail the requirements of the standard, this is an anomaly. The test operator needs to determine whether the anomaly was a result of the applied electrical stress. The investigation is done by repeating the section of the test where the anomaly occurred three times. If the same or a similar anomaly occurs in any of the three repeat trials, it is confirmed as a response to the stress. If not, the anomaly is judged unreproducible and is not considered when judging the A, B, or C observed performance. Since there is usually no ability to confirm a Criterion D anomaly, these are usually treated as Criterion D upon a single occurrence.

Tests that require Criterion B performance will be judged to Pass if criteria A or B is observed. Similarly, tests that require Criterion C performance will be judged to Pass if criteria A, B, or C is observed.

ANNEX

The remainder of this report is an Annex containing individual test data records. These records are the basis for the judgments summarized in section 1 of this report. The Annex ends with a set of concluding notes regarding use of the report.

Test Record
Transmitter Bandwidth Tests
Test IDs TR06
Project GCL0463

Test Date(s) 08 May 2024
Test Personnel Majid Farah

Product Model A04884
Serial Number tested 8LY000159

Operating Mode M3 (BleTx)
Arrangement A4 (Udc)
Input Power 5 Vdc

Test Standards: FCC Part 15, ANSI C63.10, RSS-GEN (as noted in Section 6 of the report).

Radio Protocol Bluetooth Low Energy (BLE)
Radio Band 2400 to 2483.5 MHz

Pass/Fail Judgment: PASS

Test record created by: Majid Farah
Date of this record: 18 Jun 2024

Original record, Version A.

Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
MXE Receiver 8.4 GHz	Keysight	N9038B	MY63460112	28-Feb-2024	1-Mar-2025

Table TR06.1: List of test equipment used

Test Software Used: Keysight PXE firmware A.37.02

Test Method

During this test the transmitter output is fed directly, or through RF attenuators, to the spectrum analyzer. The analyzer has a built-in capability to identify the minimum bandwidth that contains a specified portion of the total power observed, and also identify parameters such as the edge frequencies for that bandwidth and the center frequency error. The spectrum is scanned many times so that the varied effects of modulation are appropriately assessed. Since the focus is on the relative distribution of energy across a range of frequencies, the absolute amplitudes recorded during this test are not relevant and may not include cable losses or attenuation factors.

Test Setup

This block diagram shows the test equipment setup.

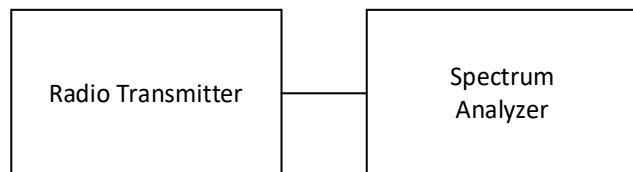


Figure TR06.1: Test setup

Test Data

The data for each test is summarized below, followed by the spectral data for each case highlighted in yellow. For BLE operating at 2 Mbps, the lowest operating frequency was 2404 MHz, and the highest operating frequency was 2478 MHz. For all other radios reported here, the lowest operating frequency was 2402 MHz, and the highest operating frequency was 2480 MHz.

The DTS Bandwidth is measured using a spectrum analyzer operating with a defined resolution bandwidth. The analysis finds the smallest continuous range of frequencies containing all emissions within 6 dB of the highest value. The requirement is that the DTS Bandwidth be greater than 500 kHz. As such the lowest measured bandwidth is worst case and is highlighted. BLE radios are judged to have met this requirement.

		2402 (04)	2440	2480 (78)
BLE	1 Mbps	723.80	713.70	727.30
BLE	2 Mbps	1201.00	1200.00	1205.00

Table TR06.2: Summary of DTS bandwidth data in kHz for BLE

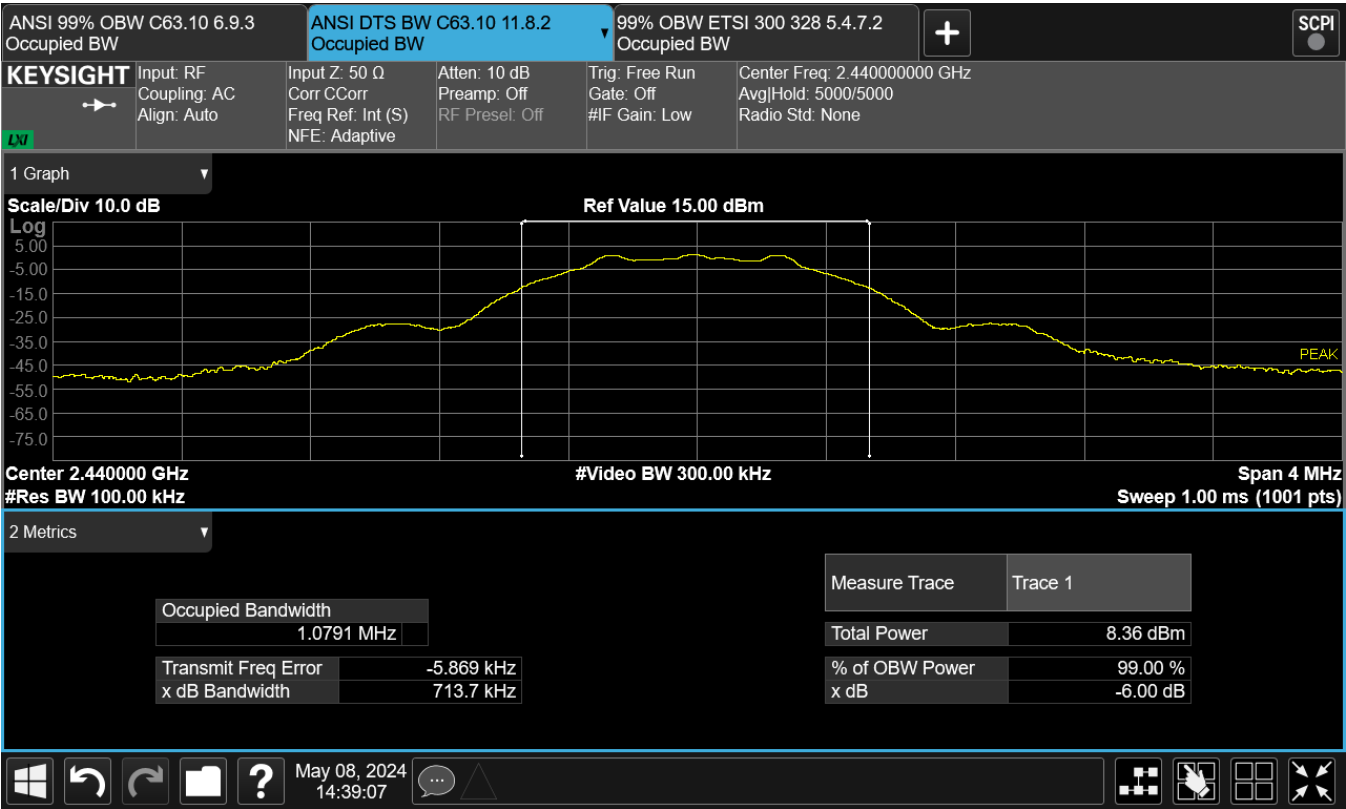


Figure TR06.2: Bandwidth data for BLE 1 Mbps at 2440 MHz

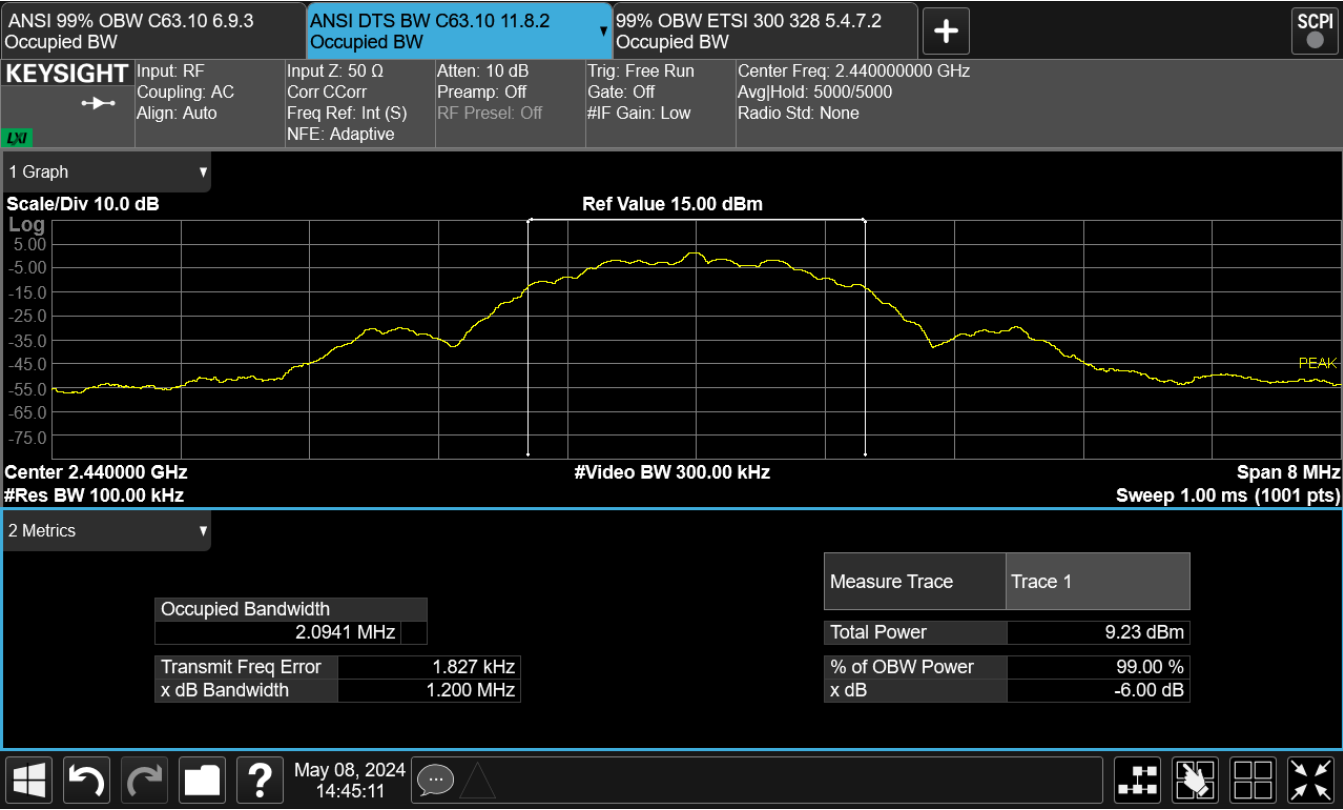


Figure TR06.3: Bandwidth data for BLE 2 Mbps at 2440 MHz

This line is the end of the test record.

Test Record
Transmitter Bandwidth Tests
Test IDs TR10
Project GCL0463

Test Date(s) 22 May 2024
Test Personnel Majid Farah

Product Model A04884
Serial Number tested 8LY000159

Operating Mode M3 (BleTx)
Arrangement A4 (Udc)
Input Power USB 5 Vdc

Test Standards: FCC Part 15, ANSI C63.10, RSS-GEN, ETSI/EN 300 328 (as noted in Section 6 of the report).

Radio Protocol Bluetooth Low Energy (BLE)
Radio Band 2400 to 2483.5 MHz

Pass/Fail Judgment: **Reported**

Test record created by: Aditya Prakash
Date of this record: 28 May 2024
Original record, Version A.

Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 44GHz	Keysight	N9048B	MY62220139	13-Mar-2024	15-Mar-2025

Table TR10.1: List of test equipment used

Test Software Used: Keysight PXE firmware A.33.03

Background

There are regulatory requirements to present two additional types of bandwidth analyses: 99% Occupied Bandwidth and Necessary Bandwidth. There are no limits or functional requirements around these data, beyond a reporting requirement. The contents of this test record are for information, and do not affect compliance of the devices that are the subject of this report.

Test Method

During this test the transmitter output is fed directly, or through RF attenuators, to the spectrum analyzer. The analyzer has a built-in capability to identify the minimum bandwidth that contains a specified portion of the total power observed, and also identify parameters such as the edge frequencies for that bandwidth and the center frequency error. The spectrum is scanned many times so that the varied effects of modulation are appropriately assessed. Since the focus is on the relative distribution of energy across a range of frequencies, the absolute amplitudes recorded during this test are not relevant and may not include cable losses or attenuation factors.

For BLE operating at 2 Mbps, the lowest operating frequency was 2404 MHz, and the highest operating frequency was 2478 MHz. For all other non-WiFi radios reported here, the lowest operating frequency was 2402 MHz, and the highest operating frequency was 2480 MHz.

Test Setup

This block diagram shows the test equipment setup.

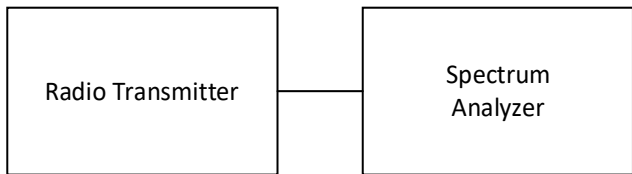


Figure TR10.1: Test setup

Test Data

The data for each test is summarized below, followed by the spectral data for each case highlighted in yellow.

The analysis threshold for the Occupied Bandwidth test was the bandwidth containing 99% of the observed power. The standards cited do not limit the Occupied Bandwidth (OBW) for all transmitter types. In such cases an OBW limit stated below may be inapplicable. Instead, the distance from the edge of the occupied band to the edge of the allocated frequency band may be more pertinent.

Mode	Speed	2402(04)	2440	2480(78)
BLE	1 Mbps	1.0572	1.0596	1.0621
BLE	2 Mbps	2.0701	2.0745	2.0758

Table TR10.2: Summary of bandwidth data in MHz for BLE modes

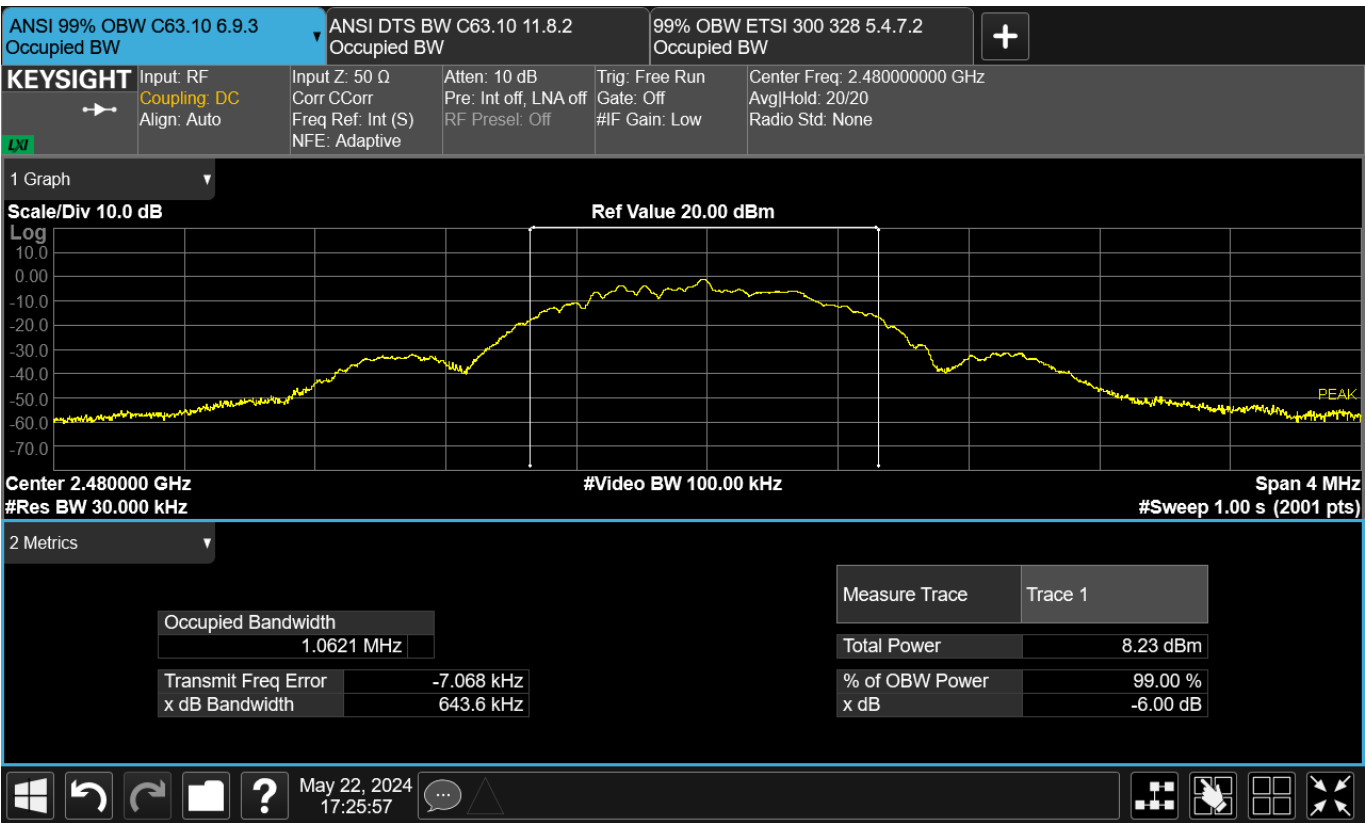


Figure TR10.2: Bandwidth data for BLE 1 Mbps at 2480 MHz

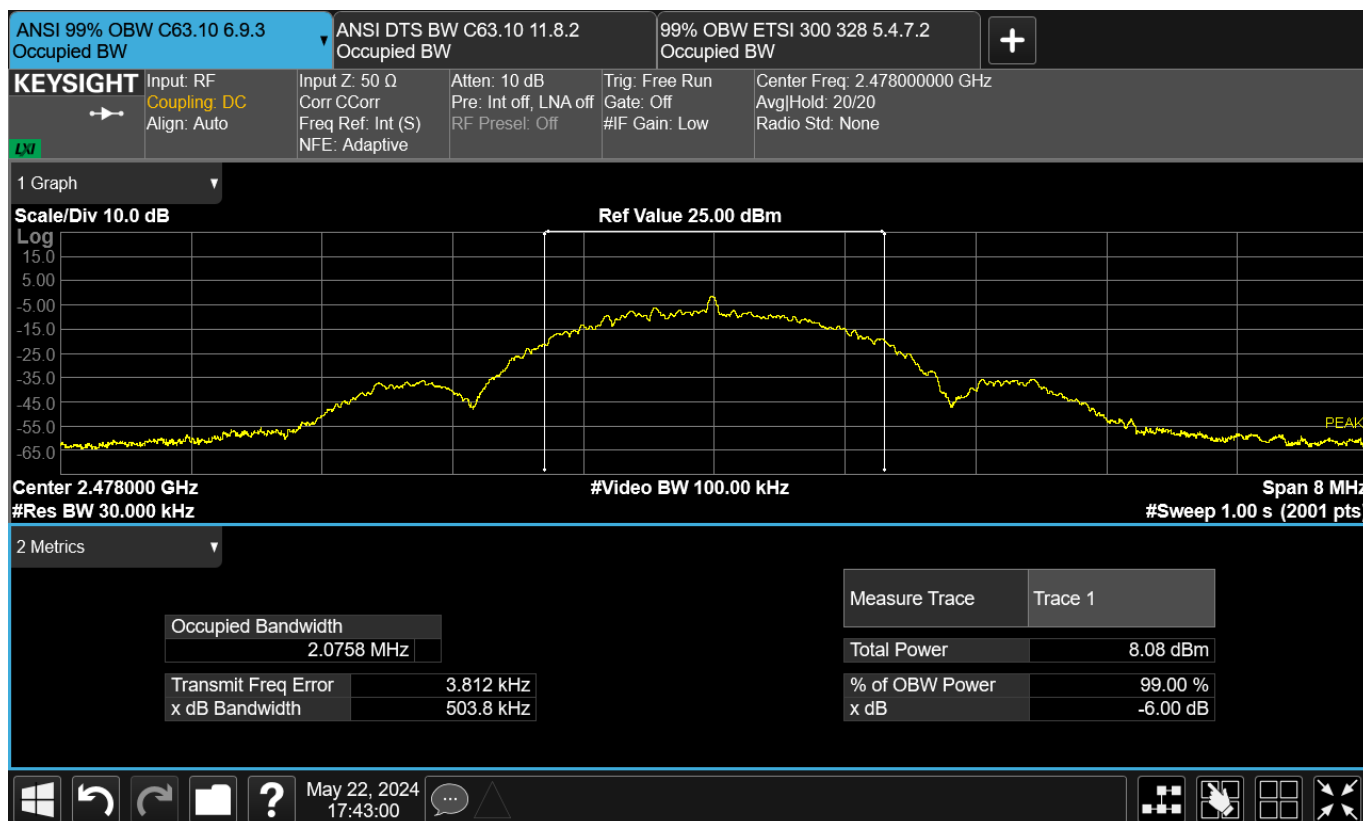


Figure TR10.3: Bandwidth data for BLE 2 Mbps at 2478 MHz

Necessary Bandwidth Calculations

The Necessary Bandwidth is a theoretical value based on the specifications for a communication protocol, rather than the hardware implementation and a subsequent lab measurement. The analysis methods in FCC Part 2.202 and TRC-43 are the same for NFC, Bluetooth, ANT, and IEEE 802.11b WiFi. However, they differ for IEEE 802.11g and 11n systems because the Canadian TRC-43 standard provides different analysis methods for Orthogonal Frequency Division Multiplexing systems (OFDM). The tables below will show the analysis for most of the radio signals as a combined approach, then separately analyze the results for IEEE 802.11g and n systems. The tables below may include radio protocols that are not part of the product being evaluated.

NFC (Near Field Communication) at 13.56 MHz uses continuous wave telegraphy without tone modulation. The bit rate 'B' in the FCC and TRC equations is split into two parts here. B is the baud rate. C is a coding factor. C=1 for Miller encoding where the transition speed is as high as the bit rate, or C=2 for Manchester encoding where the transition speed is as high as twice the bit rate). K is a factor set to 3 for non-fading circuits under the standards. The Necessary Bandwidth, B_N is then:

$$B_N = BCK$$

Radio Type	B (kbaud)	C	K	B_N (kHz)
NFC A	106	1	3	318.0
NFC B	212	2	3	1272.0
NFC B	424	2	3	2544.0

Table TR10.100: Necessary Bandwidth for NFC

The radio modulation schemes for Ant, for the various Bluetooth protocols, and for IEEE 802.11 b WiFi are a mix of Phase Shift Key (PSK) and Quadrature Amplitude Modulation (QAM) techniques. The Necessary Bandwidth calculations use the equations from 47CFR Part 2.202(g) table section 6. We have set the variable K=1, which leaves the equation for both PSK and QAM as:

$$B_N = 2R / \log_2(S)$$

where B_N is the Necessary Bandwidth, R is the bit rate, and S is the number of signaling states.

Radio Type	R Mbps	K	S	LogBase2 of (S)	B _N (MHz)
ANT / ANT+	1	1	2	1	2

Table TR10.101: Necessary Bandwidth for ANT and ANT+ Radio Protocols (FCC and TRC-43)

Radio Type	Sub-type	Method	R Mbps	K	S	LogBase2 of (S)	B _N (MHz)
Bluetooth	BR	GFSK	1	1	2	1	2
	EDR2	Pi/4 DPSK	2	1	4	2	2
	EDR3	8DPSK	3	1	8	3	2
BLE	1Mbps	GFSK	1	1	2	1	2
	2Mbps	DQPSK	2	1	4	2	2

Table TR10.102: Necessary Bandwidth for Bluetooth Radio Protocols (FCC and TRC-43)

Radio Type	Sub-type	R Mbps	K	S	LogBase2 of (S)	B _N (MHz)
802.11 b	1	1	1	2	1	2
	2	2	1	4	2	2
	5.5	5.5	1	4	2	5.5
	11	11	1	4	2	11

Table TR10.103: Necessary Bandwidth for IEEE 802.11 b Radio Protocol (FCC and TRC-43)

Radio Type	Sub-type	R Mbps	K	S	LogBase2 of (S)	B _N (MHz)
802.11 a/g	6	6	1	2	1	12
	9	9	1	2	1	18
	12	12	1	4	2	12
	18	18	1	4	2	18
	24	24	1	16	4	12
	36	36	1	16	4	18
	48	48	1	64	6	16
	54	54	1	64	6	18
802.11 n/ac	MCS0	7.2	1	2	1	14.4
	MCS1	14.4	1	4	2	14.4
	MCS2	21.7	1	4	2	21.7
	MCS3	28.9	1	16	4	14.5
	MCS4	43.3	1	16	4	21.7
	MCS5	57.8	1	64	6	19.3
	MCS6	65	1	64	6	21.7
	MCS7	72.2	1	64	6	24.1
	MCS8	86.7	1	256	8	21.7

Table TR10.104: Necessary Bandwidth for IEEE 802.11 a, g, n, and ac 20 MHz Radio Protocols (FCC)

Radio Type	Sub-type	R Mbps	K	S	LogBase2 of (S)	B _N (MHz)
802.11 n/ac	MCS0	15	1	2	1	30.0
	MCS1	30	1	4	2	30.0
	MCS2	45	1	4	2	45.0
	MCS3	60	1	16	4	30.0
	MCS4	90	1	16	4	45.0
	MCS5	120	1	64	6	40.0
	MCS6	135	1	64	6	45.0
	MCS7	150	1	64	6	50.0
	MCS8	180	1	256	8	45.0
	MCS9	200	1	256	8	50.0

Table TR10.105: Necessary Bandwidth for IEEE 802.11 n and ac 40 MHz Radio Protocols (FCC)

As a note, the bit rate for IEEE 802.11 n or ac WiFi is calculated based on the IEEE standard's short guard interval of 400 nsec. If only the long guard interval of 800 nsec were implemented, the bit rates would decrease by a small amount.

The TRC-43 method for OFDM signals simply multiplies the number of subcarriers, K, and the subcarrier spacing, N_s. In both cases, N_s is 312.5 kHz. The count of subcarriers includes nulls. So for example, 802.11 n uses 4 pilot subcarriers, 52 data subcarriers, and one null suppressed subcarrier in the middle for 57 total subcarrier channels.

$$B_N = N_s * K$$

Radio Type	Mode	N _s (MHz)	K	B _N (MHz)
802.11a/g	20 MHz	0.3125	53	16.6
802.11n/ac	20 MHz	0.3125	57	17.8
802.11n/ac	40 MHz	0.3125	117	36.6

Table TR10.106: Necessary Bandwidth for IEEE 802.11 a, g, n, and ac Radio Protocols (TRC-43)

This line is the end of the test record.

Test Record
Transmitter Power
Test IDs TR02, TR03
Project GCL0463

Test Date(s) 15 May, June 12 2024
Test Personnel Jim Solum, Majid Farah

Product Model A04884
Serial Number tested 8LY000159

Operating Mode M3 (BleTx), M5 (AntTx)
Arrangement A4 Udc
Input Power 5Vdc

Test Standards: FCC Part 15, ANSI C63.10, ETSI EN 300 328, RSS-GEN, RSS-247 (as noted in Section 6 of the report).

Antenna Gain 2.8 dBi, as reported by the client
Radio Protocol Bluetooth Low Energy, ANT

Pass/Fail Judgment: PASS

Test record created by: Jim Solum
Date of this record: 13 Jun 2024
Original record, Version A.

Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
RF Power Sensor	Rohde&Schwarz	NRP8S	109927	7-Jul-2023	1-Jul-2024
RF Power Sensor	Rohde&Schwarz	NRP8S	109124	18-Jul-2023	15-Jul-2025
DMM Multimeter	FLUKE	79 III	71740743	11-Apr-2024	11-Apr-2027
Thermometer	Thermco	ACCD370P	210607316	21-Sep-2023	15-Sep-2025
Thermal Chamber	Tenney	T2RC	32774-02	Calibration	Not Required

Table TR02.1: List of test equipment used

Software used: Rohde & Schwarz Power Viewer V11.3; TimePowerAnalysisSpreadsheetv11.xls

Test Method

The basic test standards provide options for the time evaluation test method. The following test methods were applied:

ETSI EN 300 328: 5.4.2.2.1
ANSI C63.10: 11.9.1.3

Under the ETSI standard, the parameters of duty cycle, transmitter timing, or medium utilization are typically not required for adaptive transceivers or transceivers emitting at 10 dBm EIRP or less, so those results will be omitted from the data set. Duty Cycle data will be included if it is relevant to test methods used for other standards such as Average Detector methods in the ANSI standards that apply duty cycle correction or certain kinds of analysis under the RF exposure standards.

Transmit Power Data

Each measurement is made conducted from the antenna port with the transmitter on a specified channel and in a selected transmission protocol.

Where standards cited here apply different analytical test methods for the same fundamental data or different limits, the results for both methods are provided and the more-strict limit may be applied. In this case, the ANSI method finds the highest value (numerical peak) and applies the 30 dBm limit from the US and Canadian standards. By

contrast, the ETSI method reports the highest numerical average observed during any transmission burst and applies a 20 dBm EIRP limit. All values met the respective limits with more than 10 dB of margin.

The results are shown below. Yellow highlighted cells indicate the highest power value for each radio protocol. Bluetooth Low Energy at the 2 Mbps data has its lowest and highest channel frequencies set at 2404 MHz and 2478 MHz. The lowest and highest operating channel frequencies for the other protocols are 2402 MHz and 2480 MHz. An NT entry in a grey cell indicates a combination of data rate and transmit channel that were not tested.

Frequency	(MHz)	2402	2404	2440	2478	2480
BT Low Energy	1 Mbps	2.93	NT	2.84	NT	2.75
BT Low Energy	2 Mbps	NT	2.92	2.85	2.76	NT
ANT	----	2.91	NT	2.83	NT	2.73

Table TR02.2: Transmit Power Summary in dBm with ANSI C63.10 analytical methods

Frequency	(MHz)	2402	2404	2440	2478	2480
BT Low Energy	1 Mbps	5.65	NT	5.58	NT	5.48
BT Low Energy	2 Mbps	NT	5.63	5.55	5.46	NT
ANT	----	5.62	NT	5.53	NT	5.44

Table TR02.3: Transmit Power Summary in dBm EIRP with ETSI analytical methods

The table below shows BLE 2402 MHz power vs temperature at nominal and hot and cold temperature extremes.

Temperature	°C	Power, dBm EIRP	Limit, dBm EIRP	Result
Nominal	20	5.90	20	Pass
Hot	60	5.26	20	Pass
Cold	-20	6.51	20	Pass

Table TR02.4: BLE 2402 MHz Transmit Power Summary in dBm EIRP with ETSI analytical methods

Additional Transmit Power Data Analysis

The technical requirements for safety to RF exposure also look at transmitter power. Since data from this report may be compared with data from RF exposure reports, this lab has performed a further analysis of the same raw data for power over time used above. This analysis applies standards such as FCC Part 2.1091, FCC Part 2.1093, RSS-102, ANSI C95.3, EN/IEC 62311, or EN 62479.

These data analyses look at average power over time in linear milliwatt units. These data are averaged over a time period no longer than 1 second.

Frequency	(MHz)	2402	2404	2440	2478	2480
BT Low Energy	1 Mbps	1.52	NT	1.49	NT	1.46
BT Low Energy	2 Mbps	NT	1.53	1.51	1.47	NT
ANT	----	1.83	NT	1.80	NT	1.76

Table TR02.5: Additional RF exposure power summary, with units of milliwatt

Setup Diagram

The following block diagrams show how the EUT and test equipment is arranged for test. The client provided a short length of cable to bring the signals out to a connector. This cable was found to have 0.8 dB of loss in this frequency range. This factor was taken into account during the data analysis.

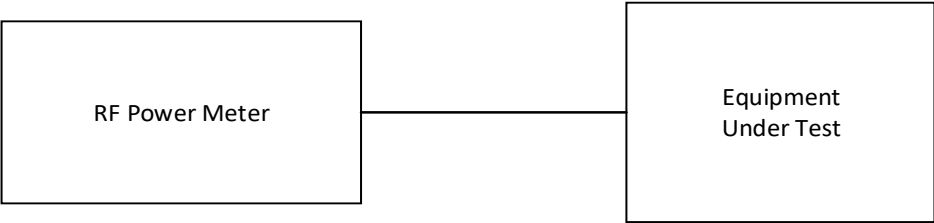


Figure TR02.1: Test equipment setup

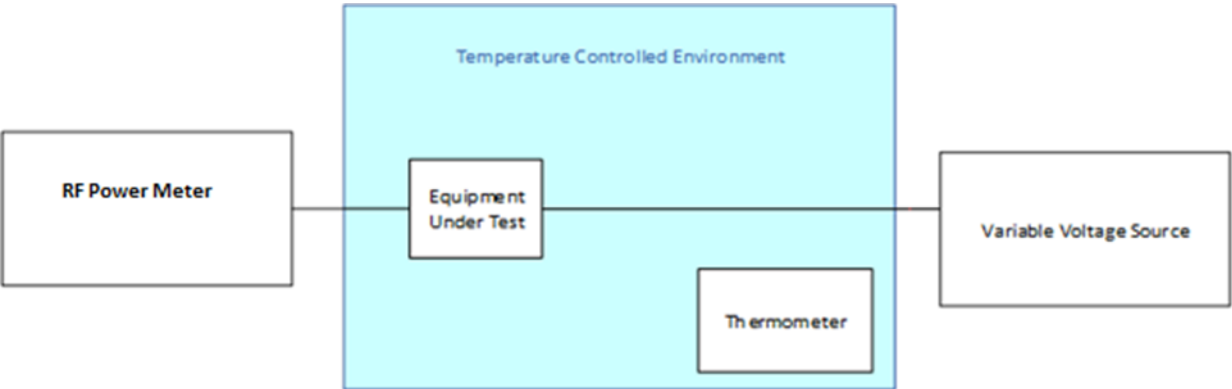


Figure TR02.2: Test equipment setup for transmit power measurements at 60°C and -20°C

This line is the end of the test record.

Test Record

Conducted Spurious Emissions Test TR27

Project GCL00463

Test Date(s) 23 May 2024
Test Personnel Majid Farah

Product Model A04884
Serial Number tested 8LY000159

Operating Mode M3 (BleTx)
Arrangement A4 (Udc)
Input Power USB 5 Vdc

Test Standards: FCC Part 15, ANSI C63.10, RSS-GEN, RSS-247 (as noted in Section 6 of the report).

Radio Protocol Bluetooth Low Energy (BLE)
Radio Band 2400 to 2483.5 MHz

Pass/Fail Judgment: **PASS**

Test record created by: Aditya Prakash
Date of this record: 31 May 2024
Original record, Version A.

Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 44GHz	Keysight	N9048B	MY62220139	13-Mar-2024	15-Mar-2025

Table TR10.1: List of test equipment used

Test Software Used: Keysight PXE firmware A.33.03

Test Method

The basic test standards provide options for the test method. The following test methods were applied:
ANSI C63.10: 11.11.2 and 11.11.3

Test Setup

This block diagram shows the test equipment setup.

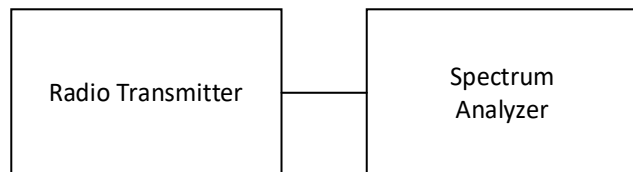


Figure TR27.1: Test setup

Test Data

The conducted spurious emission test measures the strength of intentional and unintentional radio signals conducted from the transmitter to the antenna across a wide range of frequencies. It does not evaluate whether intentional signals meet specific limits. Rather, it ensures that magnitudes unintentional signals are sufficiently reduced relative to the intentional signal to satisfy the requirements of the relevant standards.

This measurement requires that a coaxial feed line from the transmitter is available as a connector exterior to the test sample. This feed line and connector may be a part of the shipping product, or it may be a special modification to the product for testing purposes. The connector is attached via laboratory cables to the measurement instrument. The results have been adjusted to account for the losses in the laboratory cables. Where feasible, the losses of any added feed lines are also included in that adjustment.

Data is collected using the required detector function(s) across the frequency range. The instrument uses a 100 kHz bandwidth detector.

The data table below shows the final measurement data which may be at harmonics of the carrier, or at frequencies that represent one of the highest data points measured.

For BLE operating at 2 Mbps, the lowest operating frequency was 2404 MHz, and the highest operating frequency was 2478 MHz. For BLE, operating at 1 Mbps, the lowest operating frequency was 2402 MHz, and the highest operating frequency was 2480 MHz.

The peak level of the fundamental is also identified. The harmonics or spurious emissions must be reduced from this fundamental level by 20 dBc. This harmonic limit is calculated and used to determine compliance. A reduction from the carrier that is greater than 20 is a passing result. The minimum margin from the peak level for each mode are highlighted in yellow.

Data plots are provided for the worst-case data sets. One plot shows the spectrum at the carrier, and another shows the spectrum across the band. On this second plot, a green reference line is at approximately the 30 dBc maximum spurious emission level.

		Frequency in MHz		
		2402 (04)	2440	2480 (78)
BLE	1 Mbps	39.67	39.75	40.57
	2 Mbps	41.13	41.00	41.53

Table TR27.2: Results Summary in dBc

The graphs below show the spectral data as continuous curves. Superimposed are the harmonic data points reported in the table above. The harmonic limit line is included as a reference.

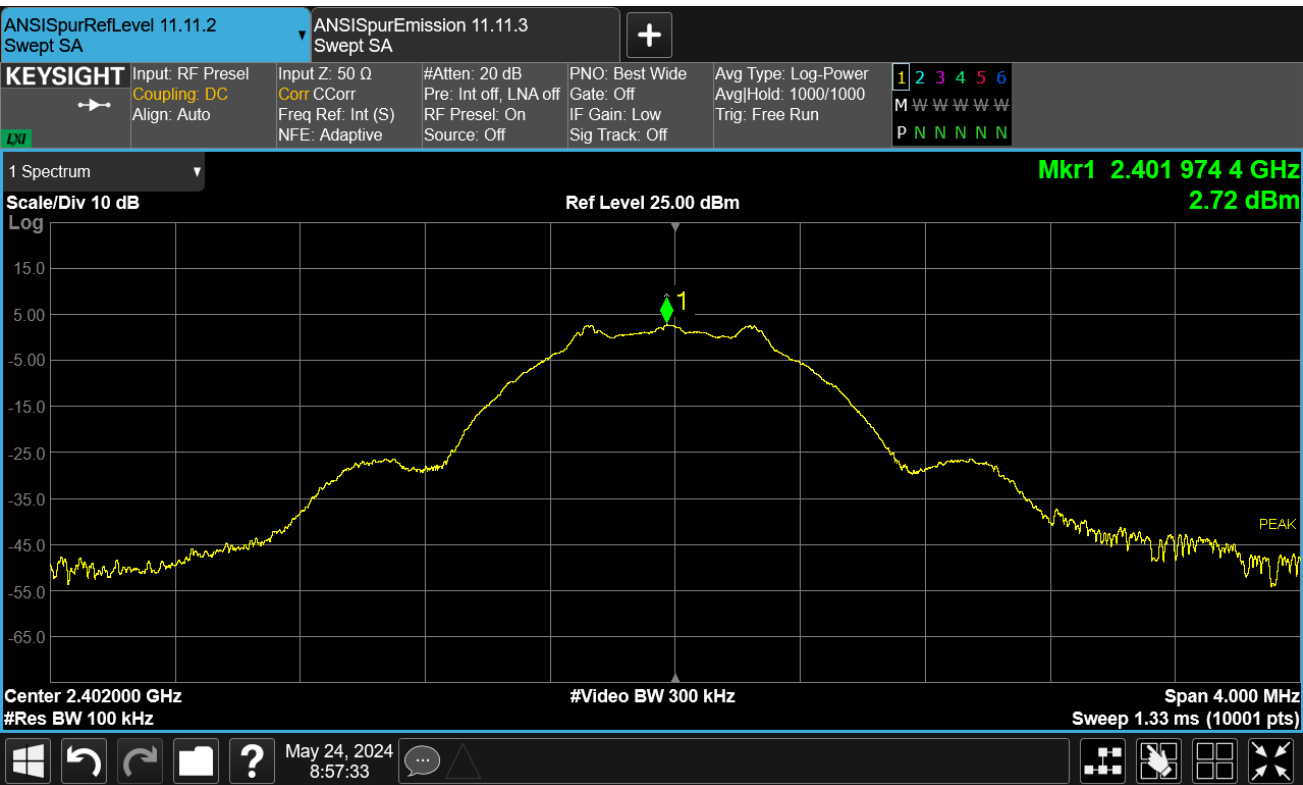


Figure TR27.2: Reference level measurement for Bluetooth BLE 1 Mbps at 2402 MHz

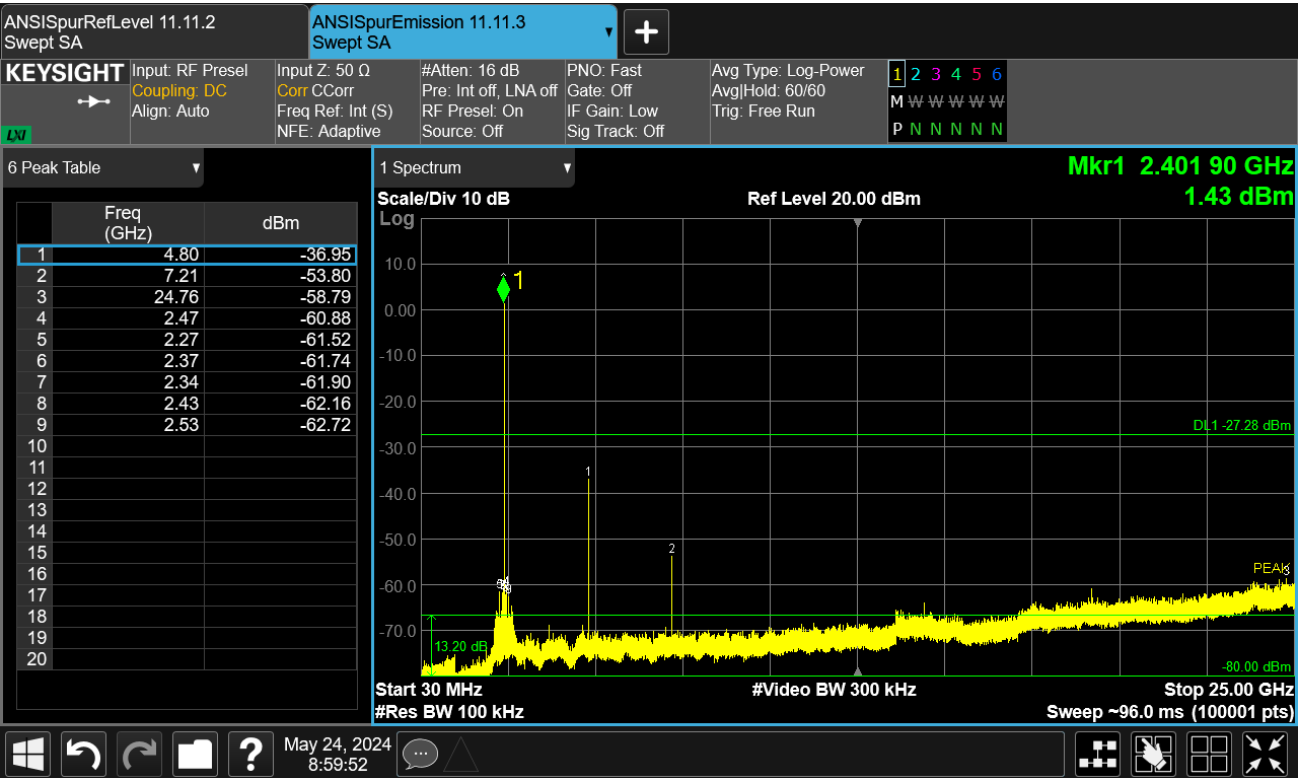


Figure TR27.3: Spectral data for Bluetooth BLE 1 Mbps at 2402 MHz

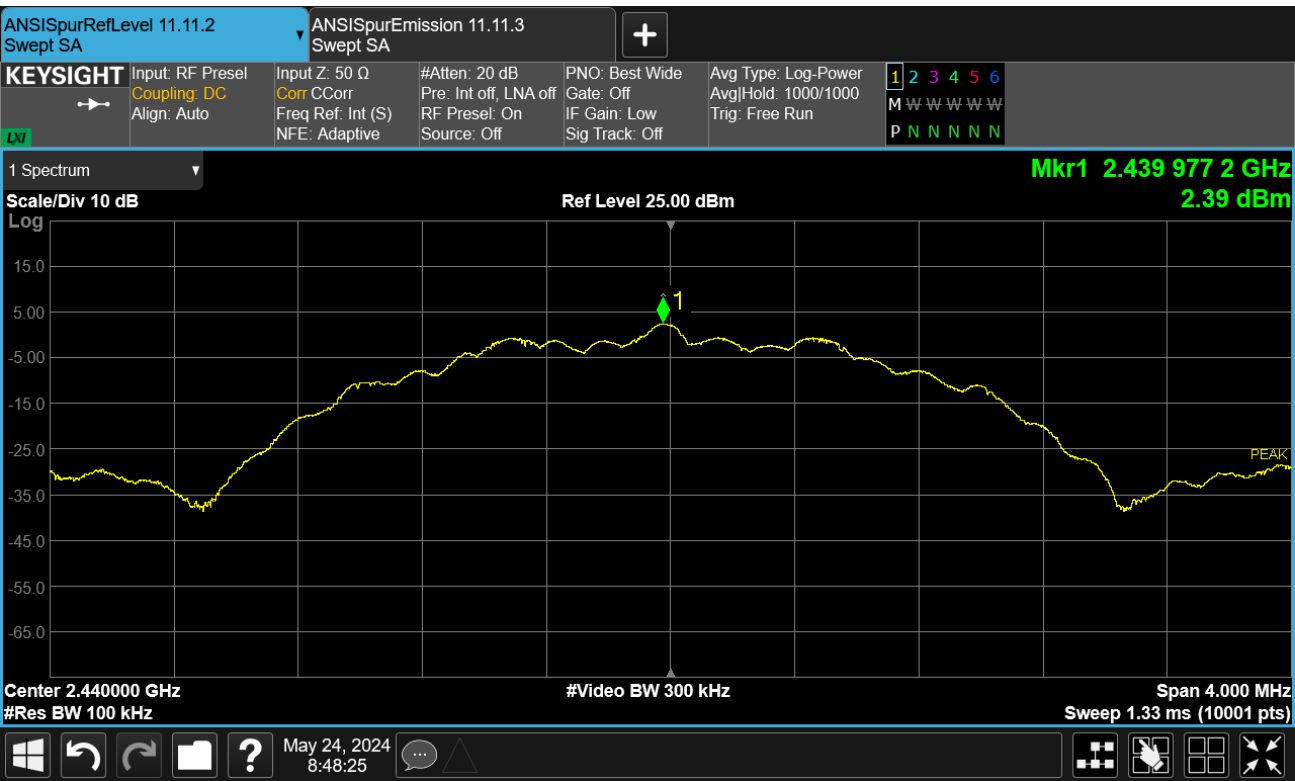


Figure TR27.4: Reference level measurement for Bluetooth BLE 2 Mbps at 2440 MHz

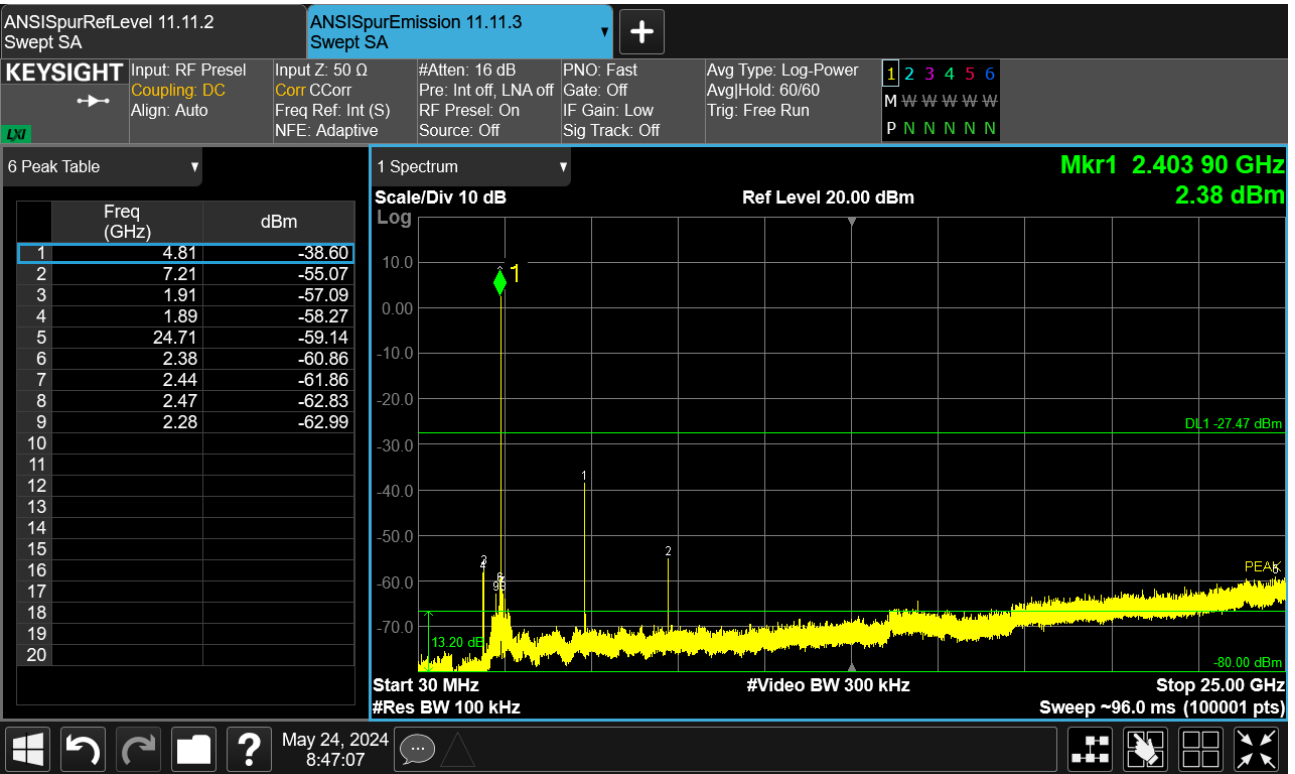


Figure TR27.5 Spectral data for Bluetooth BLE 2 Mbps at 2440 MHz

This line is the end of the test record.

Test Record
Radiated Emission Test RE03
Project GCL00463

Test Date(s) 08 May 2024
 Test Personnel David Kerr, Jim Solum

Product Model A04884
 Serial Number tested 8LY000163

Operating Mode M3 (BleTx)
 Arrangement A2 (Upwr)
 Input Power USB 5Vdc

Test Standards: FCC Part 15, ANSI C63.10, RSS-247, RSS-GEN (as noted in Section 6 of the report)

Frequency Range: Restricted Bands (2200-2300 MHz, 2310-2390 MHz, 2483.5-2500 MHz)

Pass/Fail Judgment: PASS

Test record created by: David A Kerr, Andy Heier
Date of this record: 08 May 2024

Original record, Version A.

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	1-Oct-2024
Antenna, Horn, 1-18 GHz	ETS Lindgren	3117	259208	7-Jun-2023	1-Jun-2024
FSOATS 3m, above 1 GHz	Frankonia	SAC3	F199004	16-Nov-2022	16-Nov-2025
Tape measure, 1" x 33'	Lufkin	PHV1410CMEN	10720	16-Jan-2023	15-Jan-2026
Preamplifier, 500 MHz 18 GHz	Com-Power	PAM-118A	18040133	Calibration	Not Required
Wifi Filter	K&L	8NSL26-2437/E82.2-0/0	1	Calibration	Not Required

Table RE03.1: Test Equipment Used

Software Used

Keysight PXE receiver software A.32.06, RE Signal Maximization Tool v2023Jul14

Test Data

The radiated emission test began with a preliminary scan in each restricted band at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Final field strength measurements were taken in that set of positions.

Restricted band measurements in the lower band were made while the transmitter was tuned to its lowest frequency of 2402 MHz for the 1 Mbps data rate, and 2404 MHz for the 2 Mbps data rate. Measurements in the upper band were made while the transmitter was tuned to its highest frequency of 2480 MHz for the 1 Mbps data rate, and 2478 MHz for the 2 Mbps data rate.

At azimuth angle 0° the 'front' reference mark of the turntable is pointed Southward. At 90° the reference mark points West. At -90° it points East. At -7° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

The tables show the selected final measurement data between the FCC restricted bands. It includes the strongest emissions observed relative to the test limit, along with other data points of interest. Where a data point is highlighted is yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC restricted band Class B Limit at 3m.

Frequency	Avg Limit	Pk Limit	Avg Level	Pk Level	Av Margin	Pk Margin	Azimuth	Height	Polarity
(MHz)	(dBuV/m)	(dBuV/m)	(dBuV/m)	(dBuV/m)	(dB)	(dB)	(degree)	(mm)	---
2389.5	54	74	34.787	50.64	19.213	23.36	185	3383	HORZ
2386	54	74	35.319	49.463	18.681	24.537	185	3383	HORZ

Table RE03.2: FCC restricted bands from 2200 to 2390 MHz (BLE 1 Mbps)

Frequency	Avg Limit	Pk Limit	Avg Level	Pk Level	Av Margin	Pk Margin	Azimuth	Height	Polarity
(MHz)	(dBuV/m)	(dBuV/m)	(dBuV/m)	(dBuV/m)	(dB)	(dB)	(degree)	(mm)	---
2483.5	54	74	38.341	62.151	15.659	11.849	-168	2589	HORZ
2483.5	54	74	38.395	62.018	15.605	11.982	-168	2589	HORZ

Table RE03.3: FCC restricted band from 2483.5 to 2500 MHz (BLE 1 Mbps)

Frequency	Avg Limit	Pk Limit	Avg Level	Pk Level	Av Margin	Pk Margin	Azimuth	Height	Polarity
(MHz)	(dBuV/m)	(dBuV/m)	(dBuV/m)	(dBuV/m)	(dB)	(dB)	(degree)	(mm)	---
2388.5	54	74	35.346	49.625	18.654	24.375	185	3383	HORZ
2388	54	74	35.494	49.841	18.506	24.159	185	3383	HORZ

Table RE03.2: FCC restricted bands from 2200 to 2390 MHz (BLE 2 Mbps)

Frequency	Avg Limit	Pk Limit	Avg Level	Pk Level	Av Margin	Pk Margin	Azimuth	Height	Polarity
(MHz)	(dBuV/m)	(dBuV/m)	(dBuV/m)	(dBuV/m)	(dB)	(dB)	(degree)	(mm)	---
2483.5	54	74	39.168	56.559	14.832	17.441	-168	2589	HORZ
2483.5	54	74	39.16	56.243	14.84	17.757	-168	2589	HORZ

Table RE03.3: FCC restricted band from 2483.5 to 2500 MHz (BLE 2 Mbps)

The graphs below show the background spectrum observed during pre-scan, as well as the final data points from the table above.

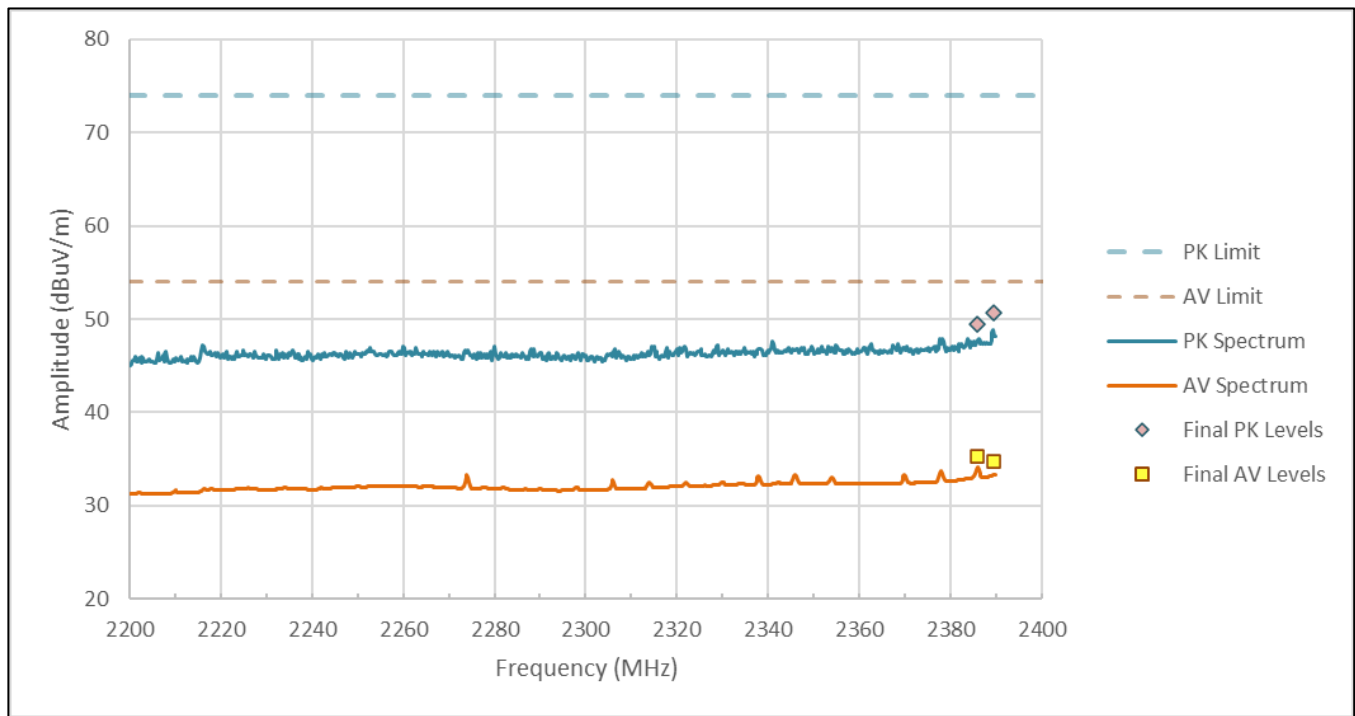


Figure RE03.1: FCC restricted band spectral data from 2200 to 2390 MHz (BLE 1Mbps)

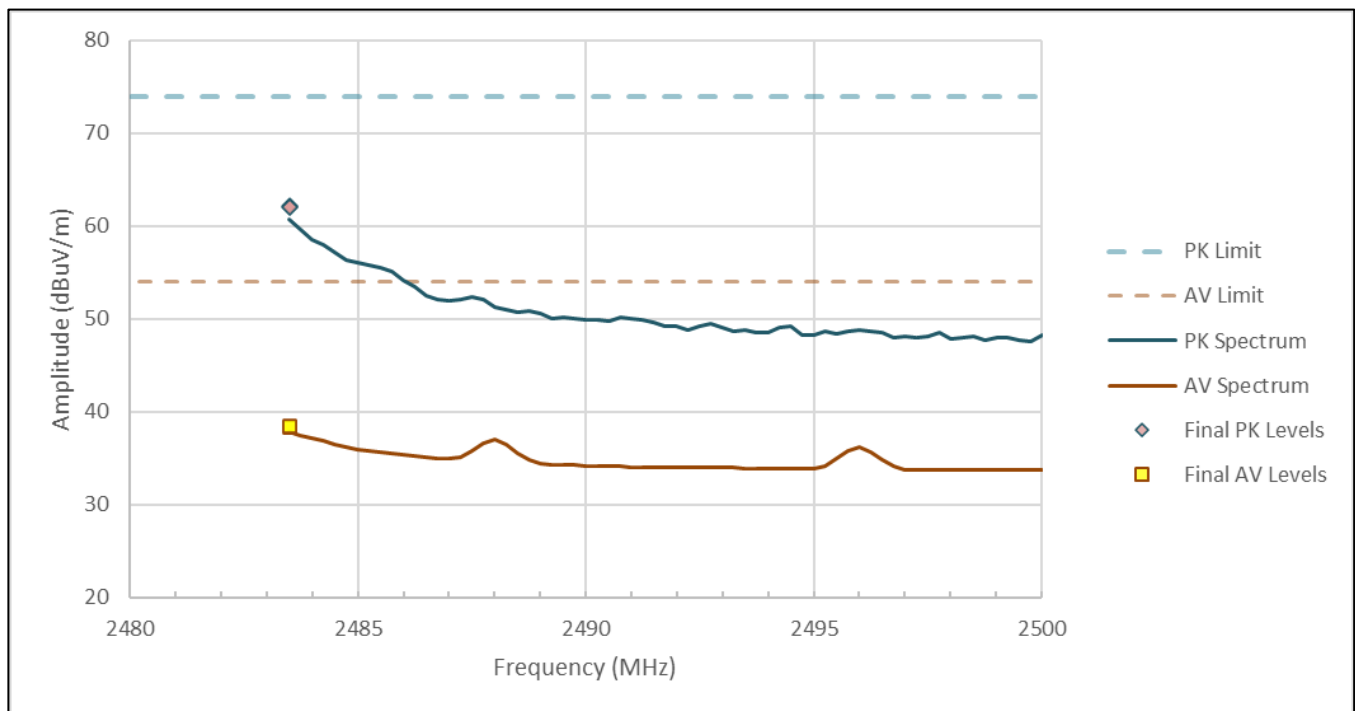


Figure RE03.2: FCC restricted band spectral data from 2483.5 to 2500 MHz (BLE 1Mbps)

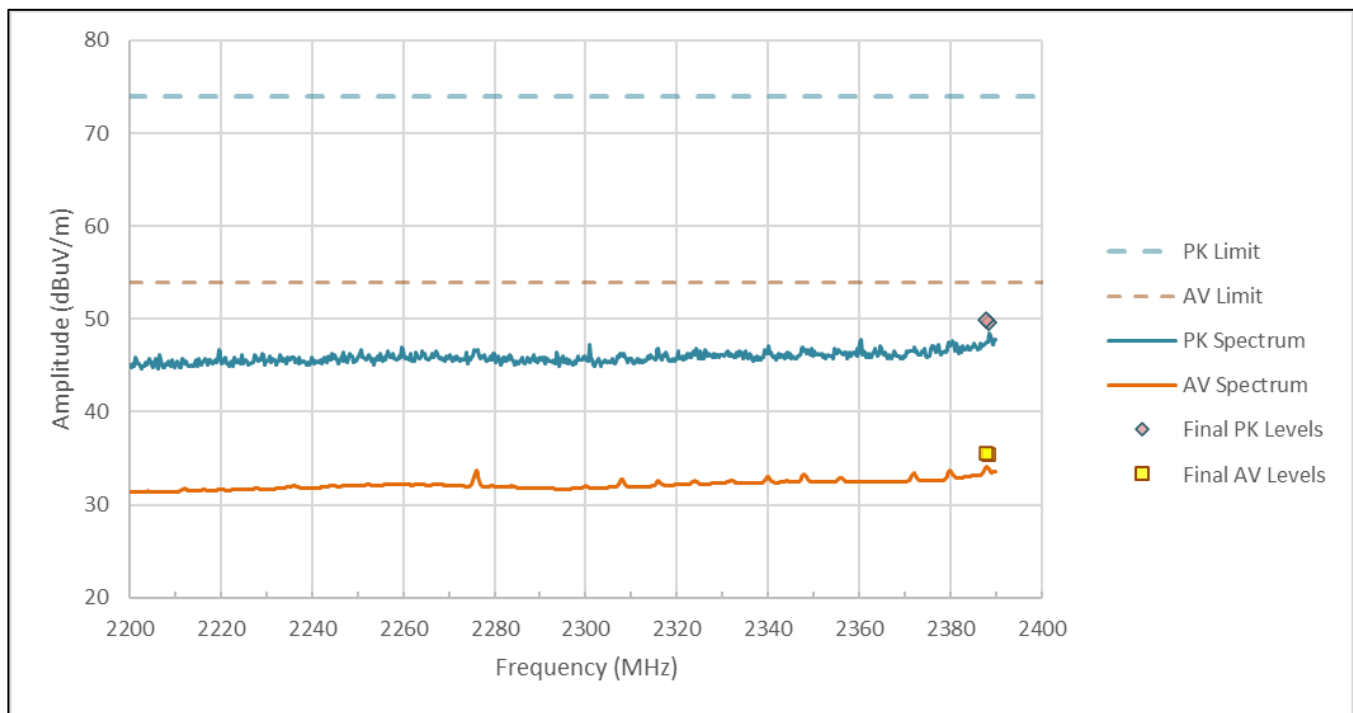


Figure RE03.1: FCC restricted band spectral data from 2200 to 2390 MHz (BLE 2 Mbps)

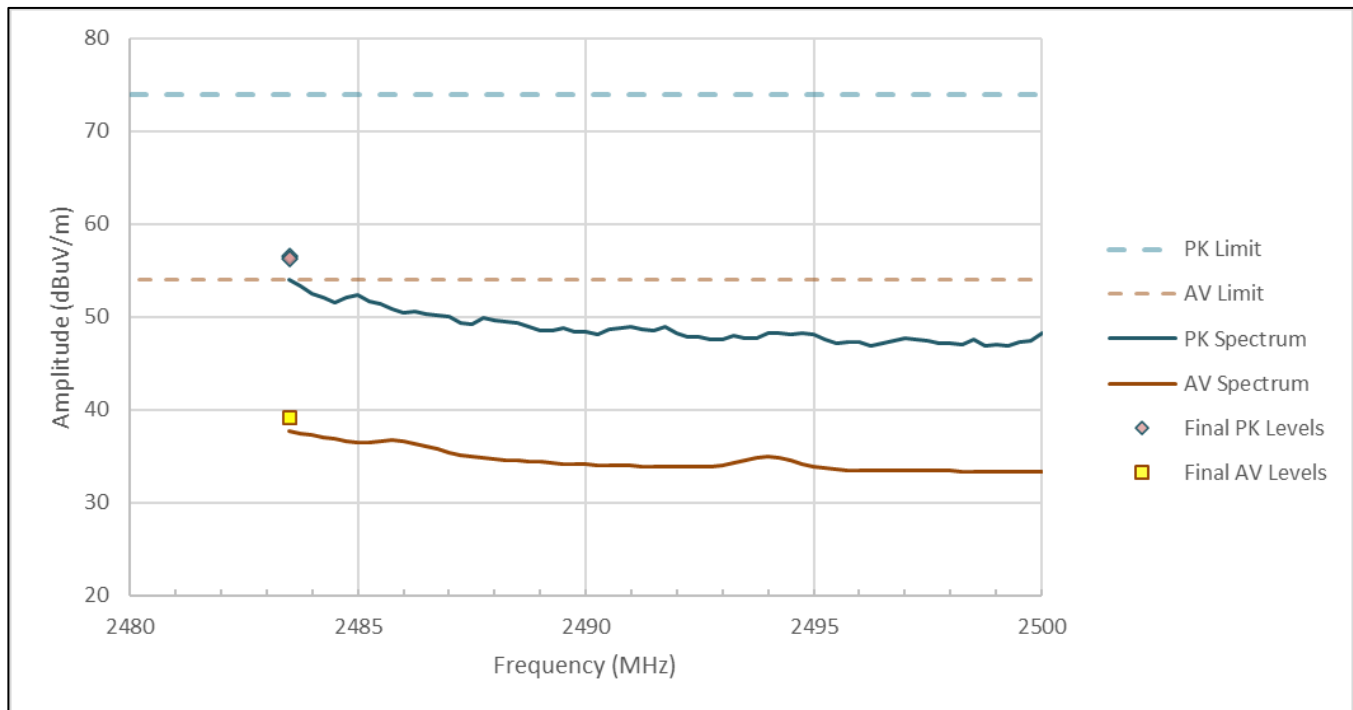


Figure RE03.2: FCC restricted band spectral data from 2483.5 to 2500 MHz (BLE 2 Mbps)

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.

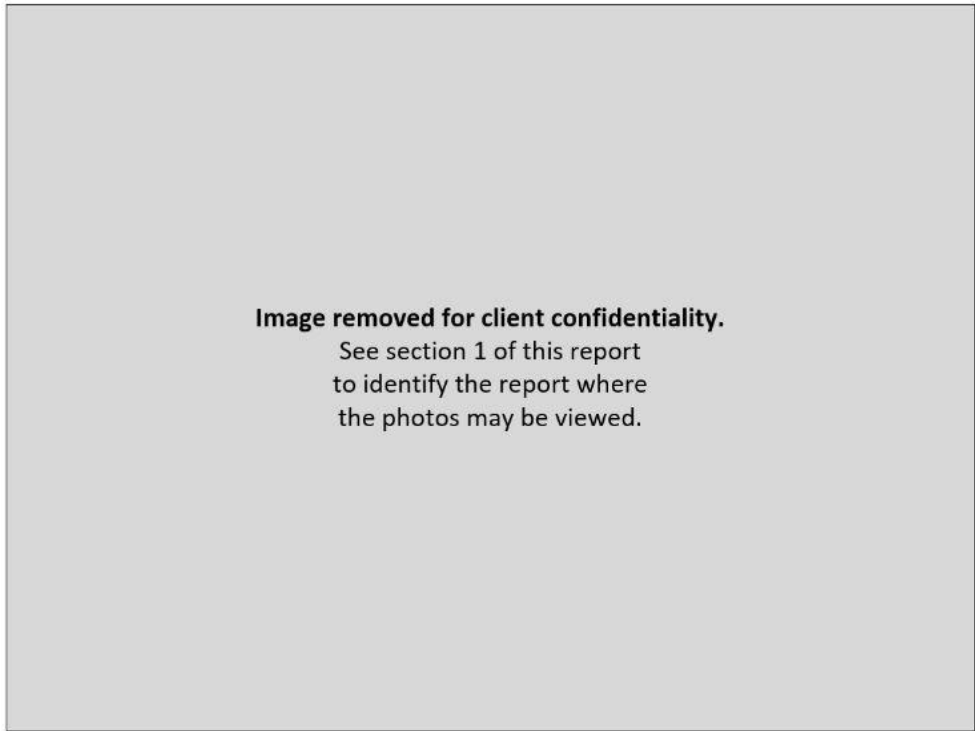


Figure RE03.3: EUT test setup, primary view



Figure RE03.4: EUT test setup, reverse view

This line is the end of the test record.

Test Record
Transmitter Power Spectral Density
Test IDs TR19
Project GCL-0463

Test Date(s) 23 May 2024
Test Personnel Majid Farah

Product Model A04884
Serial Number tested 8LY000159

Operating Mode M3 (BleTx)
Arrangement A4 (Udc)
Input Power 5Vdc

Test Standards: FCC Part 15, ANSI C63.10, AS/NZS 4268, RSS-GEN, RSS-247 (as noted in Section 6 of the report).

Antenna Gain 2.8 dBi, as reported by the client
Radio Protocol Bluetooth Low Energy (BLE)

Pass/Fail Judgment: PASS

Test record created by: Aditya Prakash
Date of this record: 30 May 2024
Original record, Version A.

Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 44GHz	Keysight	N9048B	MY62220139	13-Mar-2024	15-Mar-2025

Table TR19.1: Test equipment used

Test Software Used: Keysight PXE firmware A.33.03

Test Method

The basic test standards provide options for the test method. The following test methods were applied.
ANSI C63.10: PKPSD (11.10.2)

Test Setup

This block diagram shows the test equipment setup.

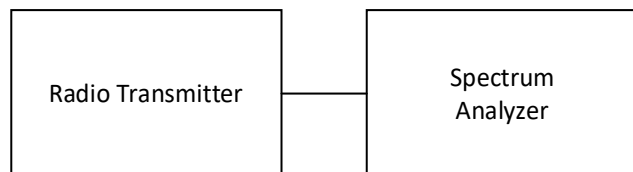


Figure TR19.1: Test setup

Test Data

Each measurement is made conducted from the antenna port with the transmitter on a specified channel and in a selected transmission protocol. The results include the effects of any measurement cable losses. Results reported are in units of dBm/Bandwidth and do not include the effect of antenna gain. The standard limit is 8 dBm / 3 kHz, and meeting the limit with higher resolution bandwidths is permitted. All data met the limit using a 30 kHz resolution bandwidth.

For BLE operating at 2 Mbps, the lowest operating frequency was 2404 MHz, and the highest operating frequency was 2478 MHz. For all other Bluetooth, BLE, and ANT radios reported here, the lowest operating frequency was 2402 MHz, and the highest operating frequency was 2480 MHz.

The highest PSD levels for each mode are highlighted in yellow, and graphical results are provided for those cases.

(Units in dBm)	2402(04)	2440	2480(78)
BLE 1Mbps	-12.22	-12.55	-12.78
BLE 2Mbps	-15.52	-15.69	-15.8

Table TR19.2: Summary of results

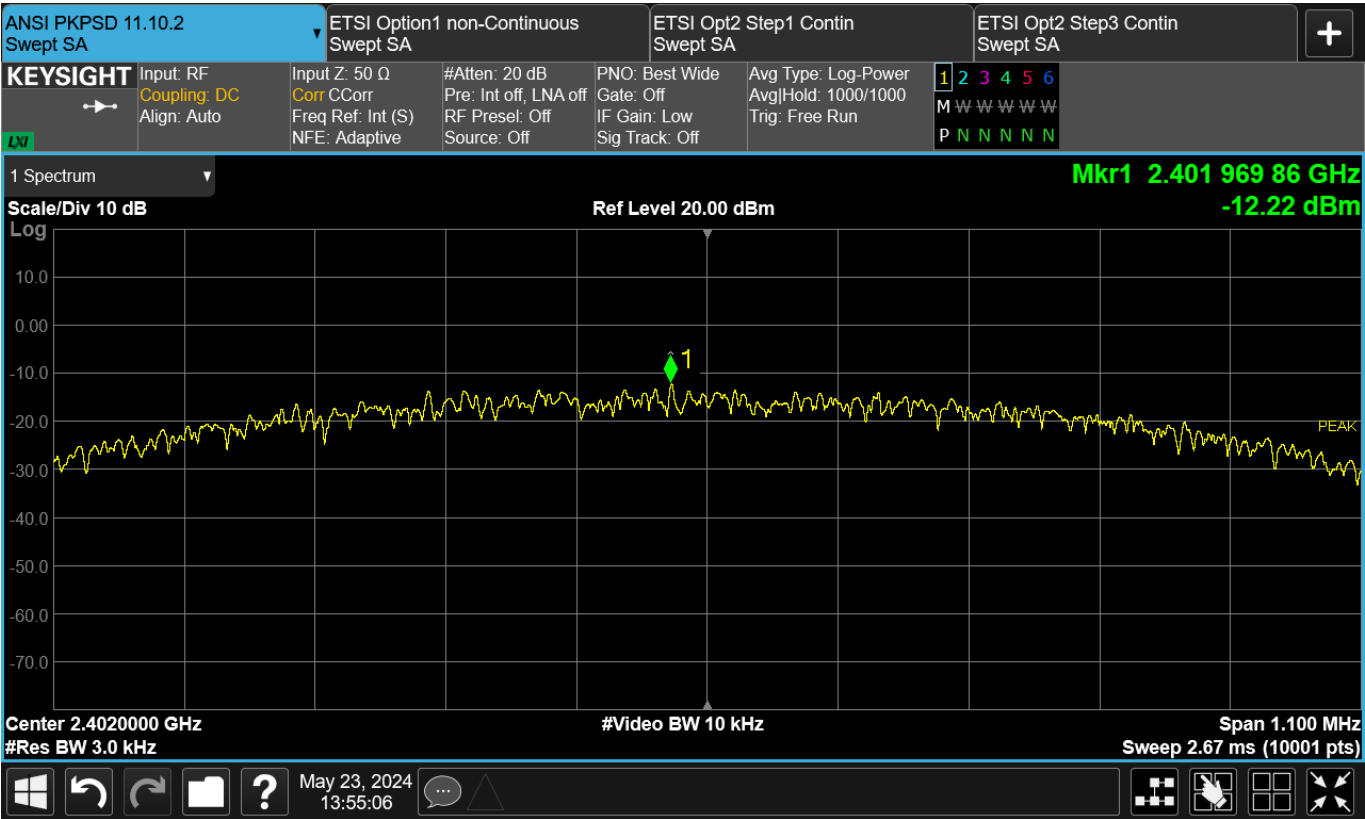


Figure TR19.2: Test data for BLE 1 Mbps 2402 MHz

This line is the end of the test record.

Test Record
Transmitter Stability in Extreme Conditions
Test IDs TR43
Project GCL-0463

Test Date(s) 12 Jun 2023
Test Personnel Majid Farah assisted by Vladimir Tolstik

Product Model A04884
Serial Number tested 8LY000159

Operating Mode M3 (BleTx)
Arrangement A4 (Udc)
Nominal Input Power USB 5 Vdc

Test Standards: FCC part 15, RSS-GEN, ANSI C63.10 (as noted in Section 6 of the report)

Radio Protocol BLE (Bluetooth Low Energy)

Pass/Fail Judgment: PASS

Test record created by: Jim Solum
Date this record: 13 Jun 2024
Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
MXE Receiver 8.4 GHz	Keysight	N9038B	MY63460112	28-Feb-2024	1-Mar-2025
DMM Multimeter	FLUKE	79 III	71740743	11-Apr-2024	11-Apr-2027
Thermometer	Thermco	ACCD370P	210607316	21-Sep-2023	15-Sep-2024
Thermal Chamber	Tenney	T2RC	32774-02	Calibration	Not Required

Table TR43.1: Equipment used

Software Used: PXE Software Revision A.37.02

Test Method

The standards cited require observation of the stability for transmission frequency and/or power at certain environmental extremes. The reference is performance on nominal input voltage and a temperature of 20 °C. Where the standards cited here impose different limits or conditions, the most stringent limits and conditions have been applied.

The acceptance criterion is that the 6 dBc Occupied Bandwidth of the modulated signal should remain within the 2400-2483.5 MHz radio band.

The modes utilized include those that showed emissions closest to the band edge during prior bandwidth testing.

Test Data

The test sample(s) were subjected to extreme conditions and performed as shown below. Yellow highlights indicate the highest level for a protocol, for which an image of the spectrum is also provided. In the spectral plots, the data sets have been combined to present the low and high channel results side by side. Markers 1 and 3 indicate the spectral peak while markers 2 and 4 are at the 2400 MHz or 2483.5 MHz band edge. Markers 2 and 4 in the table below spectral data show differences to Markers 1 and 3.

Tx Mode	Temp	Volts	Low Ch.	High Ch.
Bluetooth	°C	Vdc	dBc	dBc
BLE 1 Mbps	60	5	-34.0	-40.0
BLE 1 Mbps	50	5	-34.3	-35.7
BLE 1 Mbps	40	5	-30.6	-37.8
BLE 1 Mbps	30	5	-31.2	-35.3
BLE 1 Mbps	20	5	-30.8	-41.0
BLE 1 Mbps	10	5	-34.6	-31.8
BLE 1 Mbps	0	5	-35.1	-38.3
BLE 1 Mbps	-10	5	-34.4	-31.3
BLE 1 Mbps	-20	5	-32.2	-30.0

Table TR43.2 Difference between peak and band edge levels for BLE 1 Mbps transmissions during temperature variations

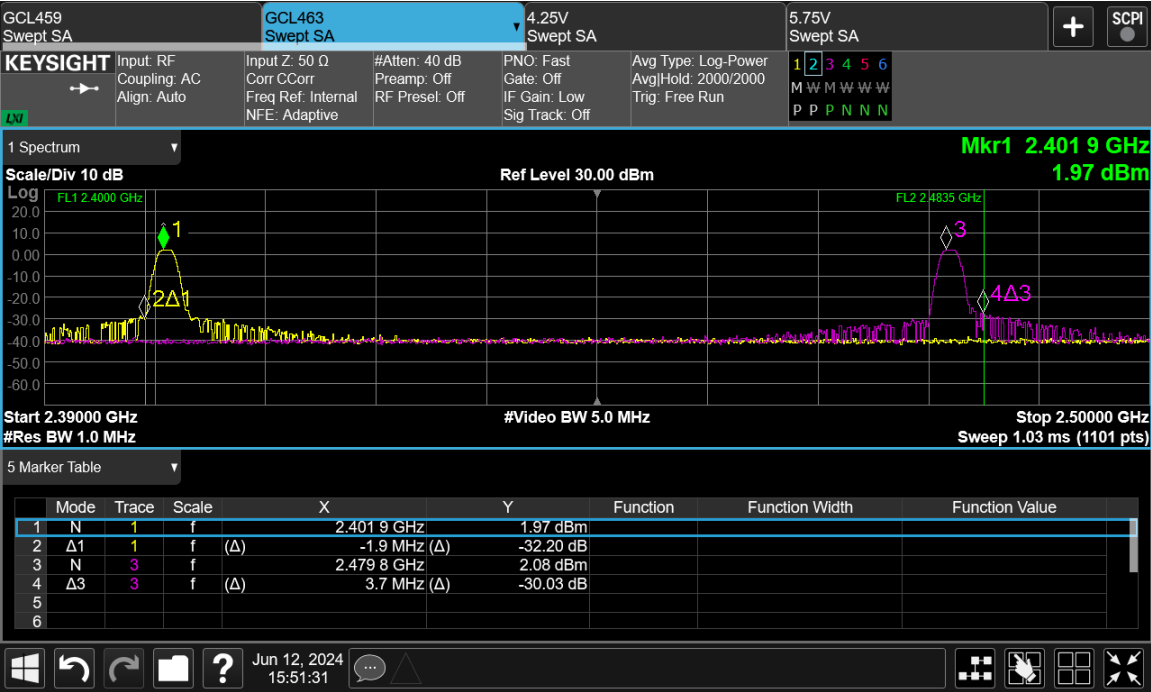


Figure TR43.1: Spectral data for BLE 1 Mbps at -20 °C which represent low and high channel

Tx Mode	Temp	Volts	Low Ch.	High Ch.
Bluetooth	°C	Vdc	dBc	dBc
BLE 1 Mbps	20	4.25	-31.82	-33.72
BLE 1 Mbps	20	5	-30.83	-40.97
BLE 1 Mbps	20	5.75	-31.37	-41.21

Table TR43.3 Difference between peak and band edge levels for BLE 1 Mbps transmissions at 20 °C during voltage variations

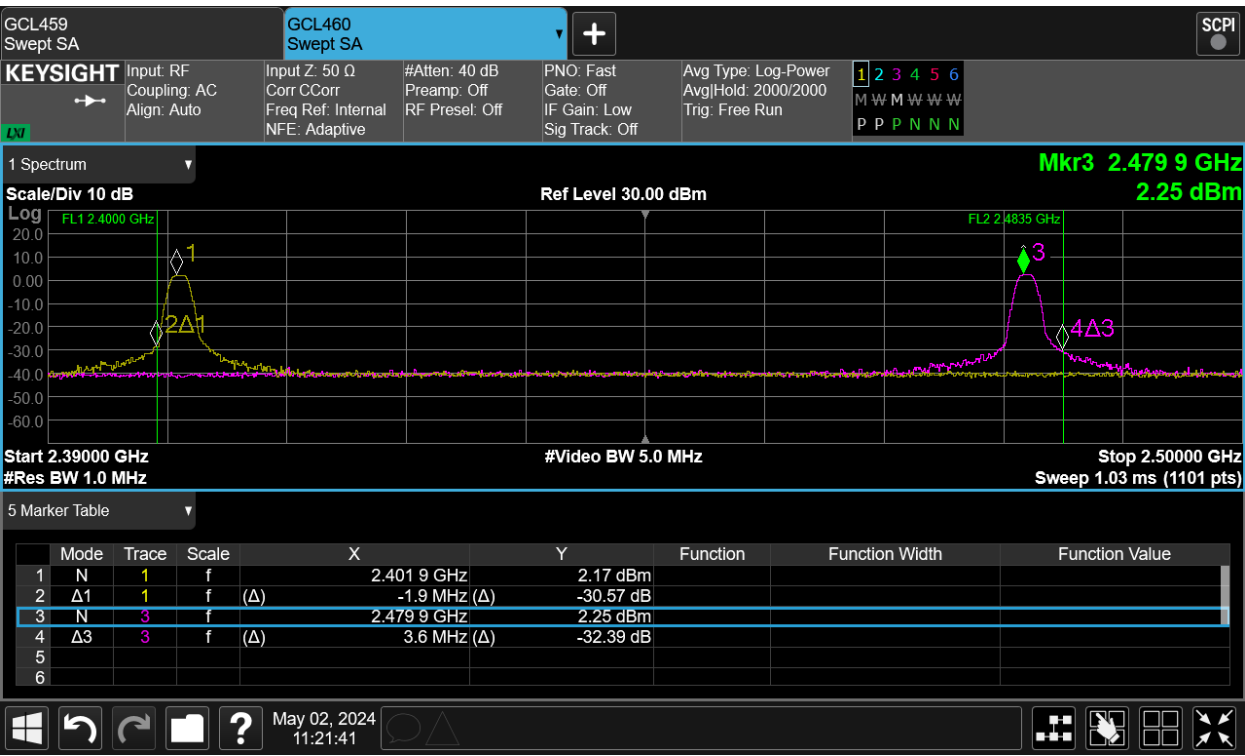


Figure TR43.2: Spectral data for BLE 1 Mbps at 20 °C which represent low and high channel at 5 V.

Setup Block Diagram

The following block diagrams show the EUT configured and arranged in the manner which it was measured.

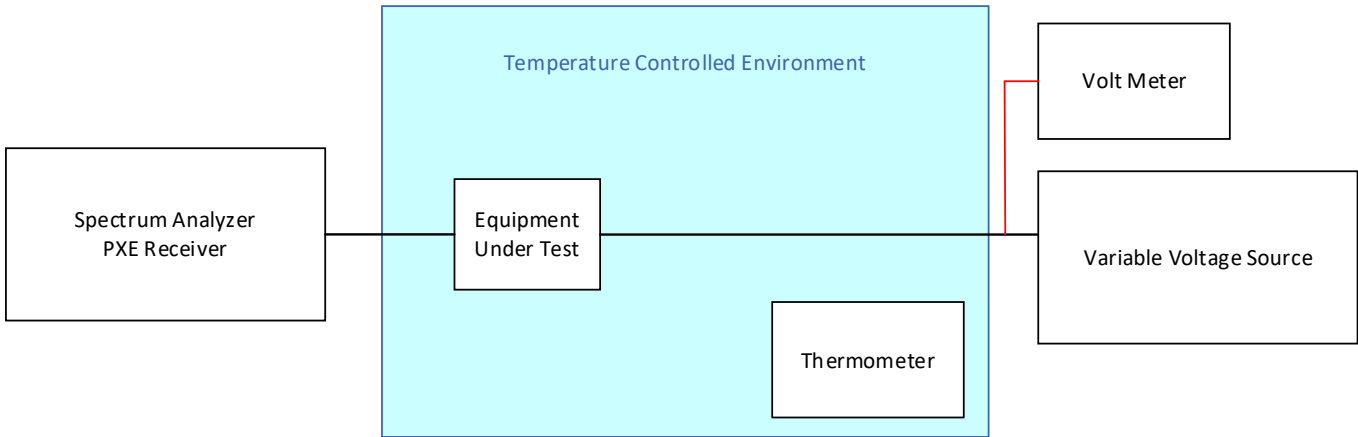


Figure TR43.3: Schematic drawing of the test equipment setup

This line is the end of the test record.

Test Record
Radiated Emission Test RE05
Project GCL0463

Test Date(s) 24 May 2024
Test Personnel David Kerr Jim Solum

Product Model A04884
Serial Number tested 8LY000163

Operating Mode M3 (BleTx)
Arrangement A2 Upwr
Input Power USB 5 Vdc

Test Standards: FCC Part 15, ANSI C63.10, RSS-247 (as noted in Section 6 of the report).

Frequency Range: 1 GHz to 2.2 GHz

Pass/Fail Judgment: PASS

Test record created by: David A Kerr

Date of this record: 24 May 2024

Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	1-Oct-2024
Antenna, Horn, 1-18 GHz	ETS Lindgren	3117	227596	14-Sep-2023	14-Sep-2025
FSOATS 3m, above 1 GHz	Frankonia	SAC3	F199004	16-Nov-2022	16-Nov-2025
Tape measure, 1" x 33'	Lufkin	PHV1410CMEN	10720	16-Jan-2023	15-Jan-2026
Preamplifier, 500 MHz 18 GHz	Com-Power	PAM-118A	18040133	Calibration	Not Required
Wifi Filter	K&L	8NSL26-2437/E82.2-0/0	1	Calibration	Not Required

Table RE05.1: Test Equipment Used

Software Used: Keysight PXE receiver software A.32.06, EPX test software Version 2023.01.001

Test Data

The radiated emission test process began with a preliminary scan at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Where the test standard requires cable manipulation, this was done at one of more likely worst case frequencies selected by the test personnel while observing the receiver display. At each of the frequencies selected for final measurements, the turntable angle, antenna height, and antenna polarization were explored to find the worst-case settings. Final field strength measurements were taken in that set of positions. Full maximization was not performed at frequencies that are noise floor measurements included per the test standard requirements.

At azimuth angle 180° the 'front' reference mark of the turntable is pointed Southward. At 270° the reference mark points West. At 90° it points East. At 173° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

The table shows the selected final measurement data between 1 GHz and 2.2 GHz. It includes at least the six strongest emissions observed relative to the test limit, along with other data points of interest. Where a data point is highlighted in yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC Class B Limit at 3m. Any unintentional radio emission limits are not applied to intentional radio signals.

In this test, fewer than six emissions were observed within 20 dB of the limit. The relevant emissions were measured, including one or more noise floor signals as judged appropriate to the spectrum.

Frequency	Pol.	Reading		Factor	Level		Limit		Margin		Height	Angle
MHz		dB(μV)		dB(1/m)	dB(μV/m)		dB(μV/m)		dB		cm	deg
		CAV	PK		CAV	PK	AV	PK	CAV	PK		
2146.000	V	32.9	46.5	-1.2	31.7	45.3	54.0	74.0	22.3	28.7	195.6	342.0

Table RE05.2: Emission summary (2402 MHz)

Frequency	Pol.	Reading		Factor	Level		Limit		Margin		Height	Angle
MHz		dB(μV)		dB(1/m)	dB(μV/m)		dB(μV/m)		dB		cm	deg
		CAV	PK		CAV	PK	AV	PK	CAV	PK		
1892.000	V	32.3	45.5	-2.0	30.3	43.5	54.0	74.0	23.7	30.5	126.4	133.0

Table RE05.3: Emission summary (2440 MHz)

Frequency	Pol.	Reading		Factor	Level		Limit		Margin		Height	Angle
MHz		dB(μV)		dB(1/m)	dB(μV/m)		dB(μV/m)		dB		cm	deg
		CAV	PK		CAV	PK	AV	PK	CAV	PK		
2150.750	V	32.5	46.1	-1.2	31.3	44.9	54.0	74.0	22.7	29.1	205.4	30.0

Table RE05.4: Emission summary (2480 MHz)

The graph below shows the background spectrum observed during pre-scan, as well as the final data points from the table above.

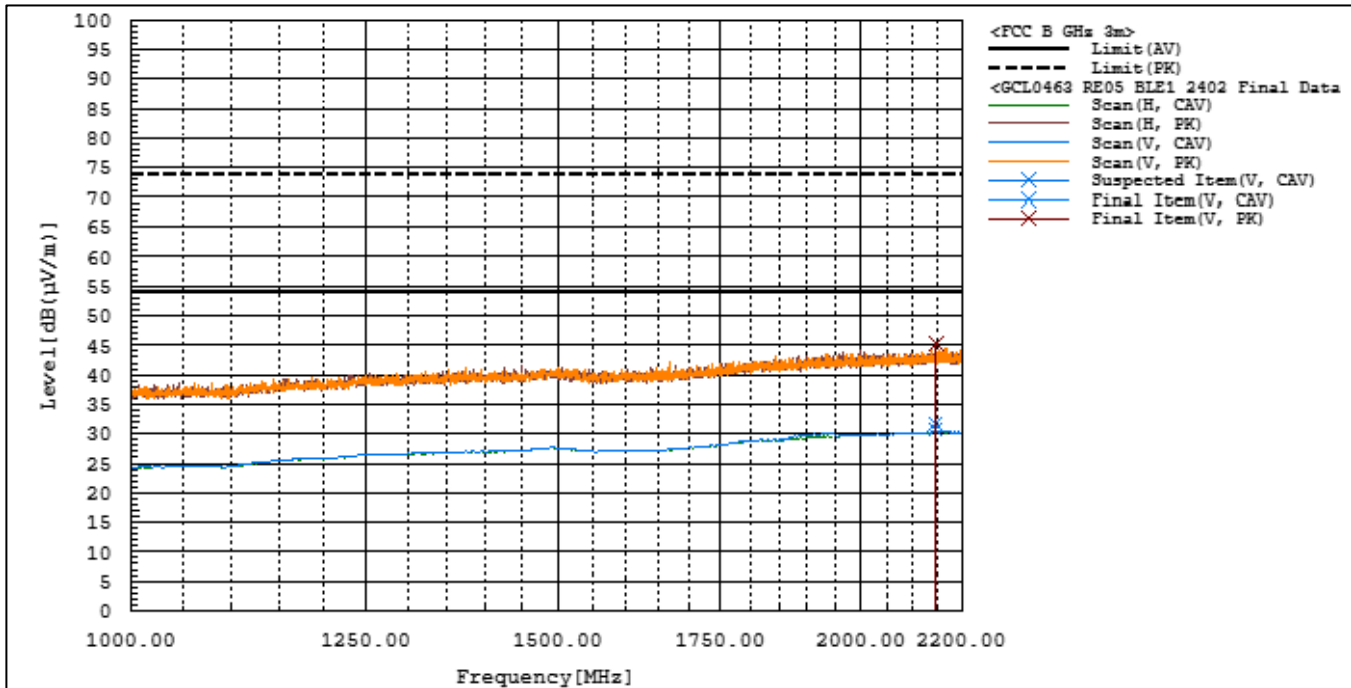


Figure RE05.1: Spectral data (2402 MHz)

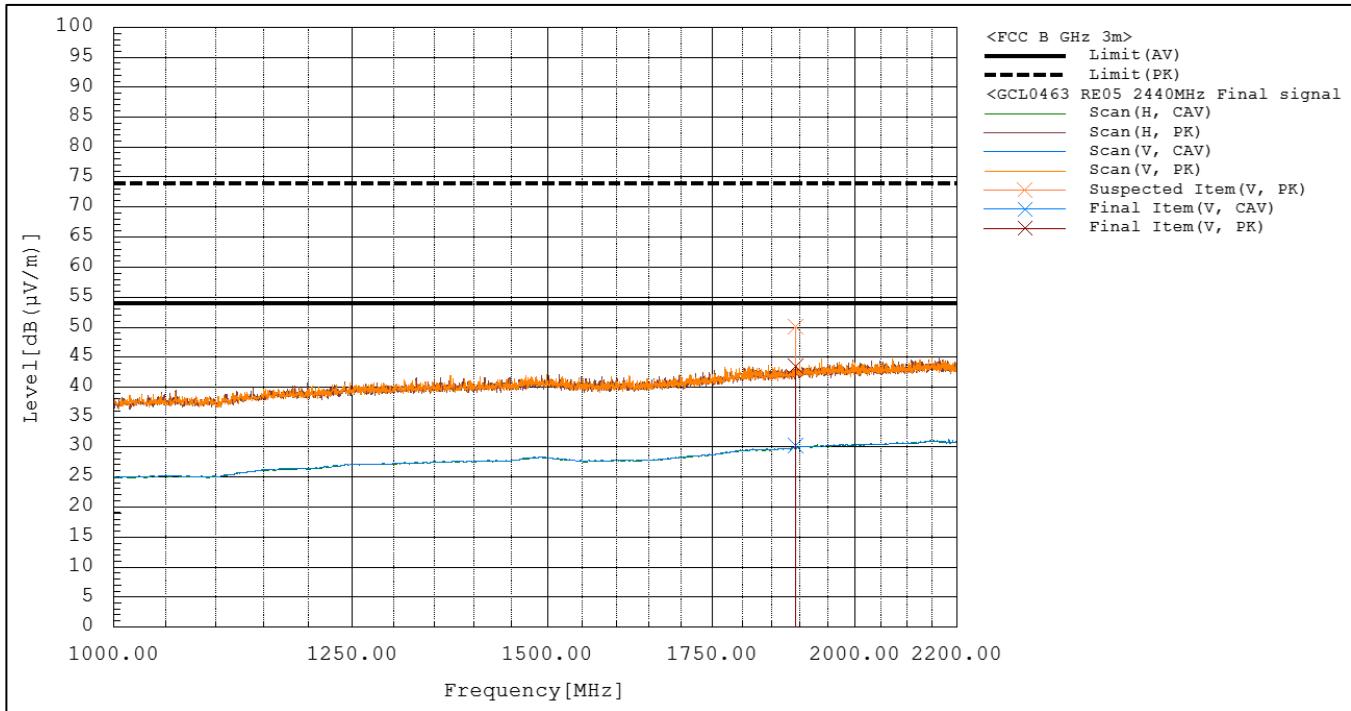


Figure RE05.2: Spectral data (2440 MHz)

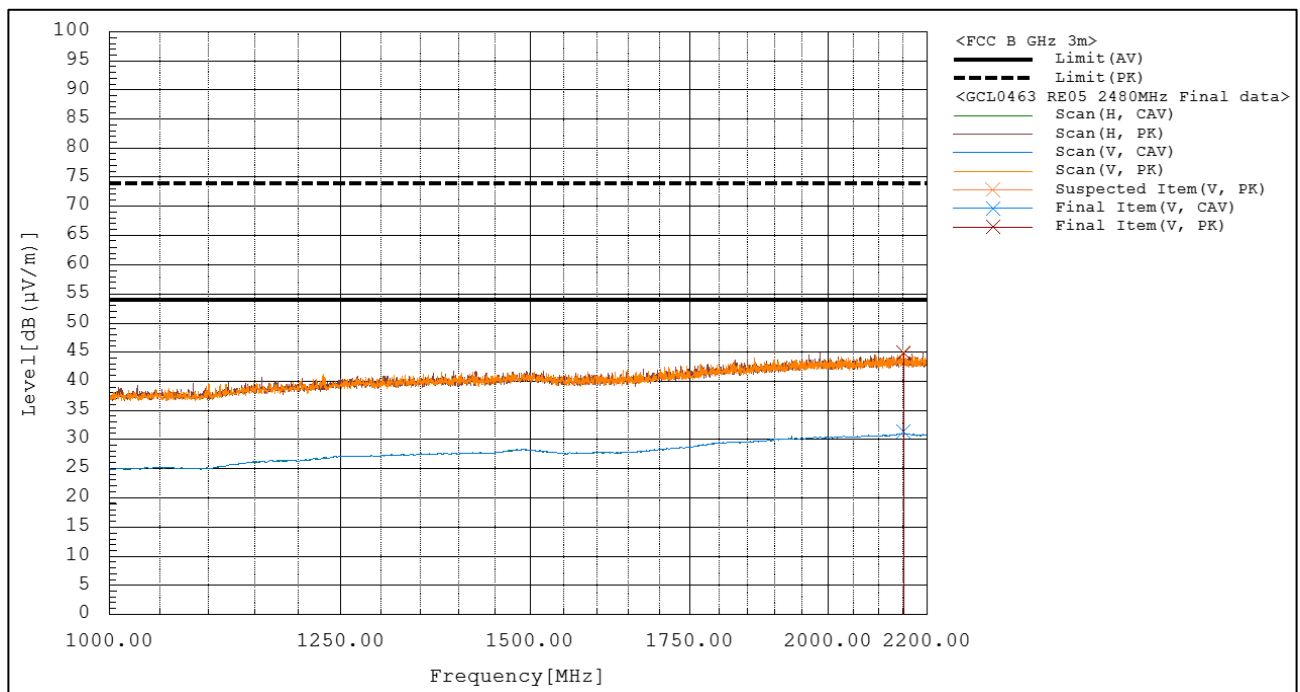


Figure RE05.3: Spectral data (2480 MHz)

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.



Figure RE05.4: EUT test setup, front view

Image removed for client confidentiality.

See section 1 of this report
to identify the report where
the photos may be viewed.

Figure RE05.5: EUT test setup, reverse view

This line is the end of the test record.

Test Record

Radiated Emission Test RE07

Project GCL0463

Test Date(s) 15 May 2024
Test Personnel Jim Solum assisted by Vladimir Tolstik

Product Model A04884
Serial Number tested 8LY000163

Operating Mode M3 (BleTx)
Arrangement A2 (Upwr)
Input Power USB 5Vdc

Test Standards: FCC Part 15, ANSI C63.10, RSS-247 (as noted in Section 6 of the report).

Frequency Range: 30 MHz to 1000 MHz

Pass/Fail Judgment: PASS

Test record created by: Jim Solum
Date of this record: 15 May 2024

Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	01-Oct-2024
Antenna, Biconilog, 30M-6 GHz	ETS Lindgren	3142E	00233204	02-Nov-2023	01-Nov-2025
SAC 3m, below 1 GHz	Frankonia	SAC3	F199004	07-Nov-2022	07-Nov-2025
Tape measure, 1" x 33'	Lufkin	PHV1410CMEN	10721	30-Aug-2023	01-Sep-2026

Table RE07.1: Test Equipment Used

Software Used: Keysight PXE receiver software A.32.06

Test Data

The radiated emission test process began with a preliminary scan at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Where the test standard requires cable manipulation, this was done at one of more likely worst case frequencies selected by the test personnel while observing the receiver display. At each of the frequencies selected for final measurements, the turntable angle, antenna height, and antenna polarization were explored to find the worst-case settings. Final field strength measurements were taken in that set of positions. Full maximization was not performed at frequencies that are noise floor measurements included per the test standard requirements.

At azimuth angle 180° the 'front' reference mark of the turntable is pointed Southward. At 270° the reference mark points West. At 90° it points East. At 173° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

The table shows the selected final measurement data between 30 MHz and 1 GHz. It includes at least the six strongest emissions observed relative to the test limit, along with other data points of interest. Where a data point is highlighted is yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC Class B Limit at 3m. Any unintentional radio emission limits are not applied to intentional radio signals.

Frequency	Pol.	Reading	Factor	Level	Limit	Margin	Height	Angle
MHz		$\text{dB}(\mu\text{V})$	$\text{dB}(1/\text{m})$	$\text{dB}(\mu\text{V}/\text{m})$	$\text{dB}(\mu\text{V}/\text{m})$	dB	cm	deg
		QP		QP	QP	QP		
33.960	V	10.5	20.6	31.1	40.0	8.9	100.0	356.0
45.240	V	14.3	15.2	29.5	40.0	10.5	100.0	163.0
52.950	V	11.3	14.0	25.3	40.0	14.7	100.0	188.0
73.350	V	10.9	14.6	25.5	40.0	14.5	116.2	18.0
77.520	V	7.7	14.5	22.2	40.0	17.8	100.0	267.0
694.620	H	-0.4	33.5	33.1	46.0	12.9	106.5	44.0
919.590	V	-0.3	35.9	35.6	46.0	10.4	118.2	84.0

Table RE07.2: Emission summary

The graph below shows the background spectrum observed during pre-scan, as well as the final data points from the table above.

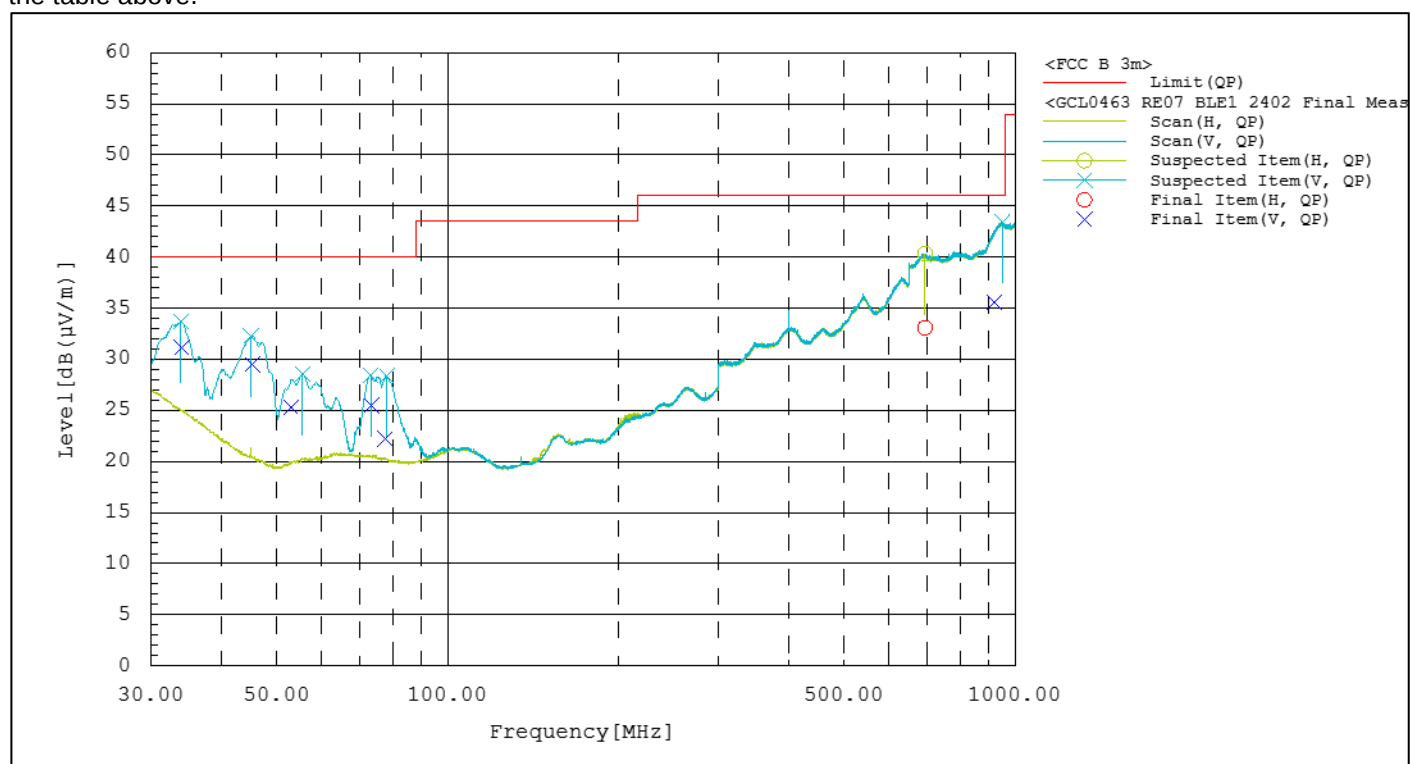


Figure RE07.1: Spectral data

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.

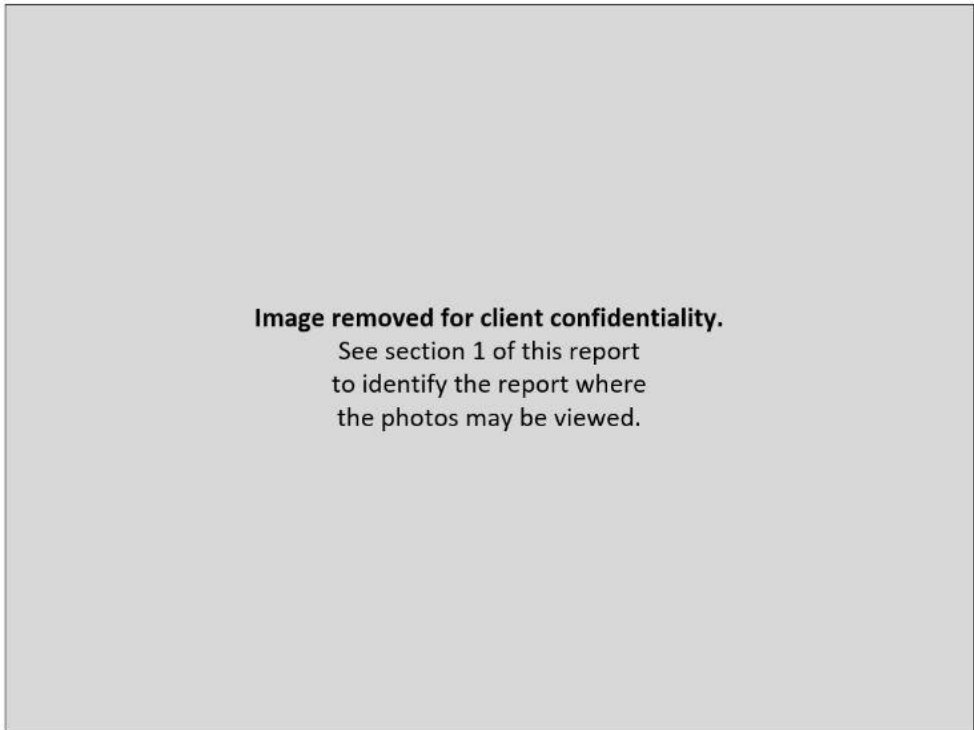


Figure RE07.2: EUT test setup, front view

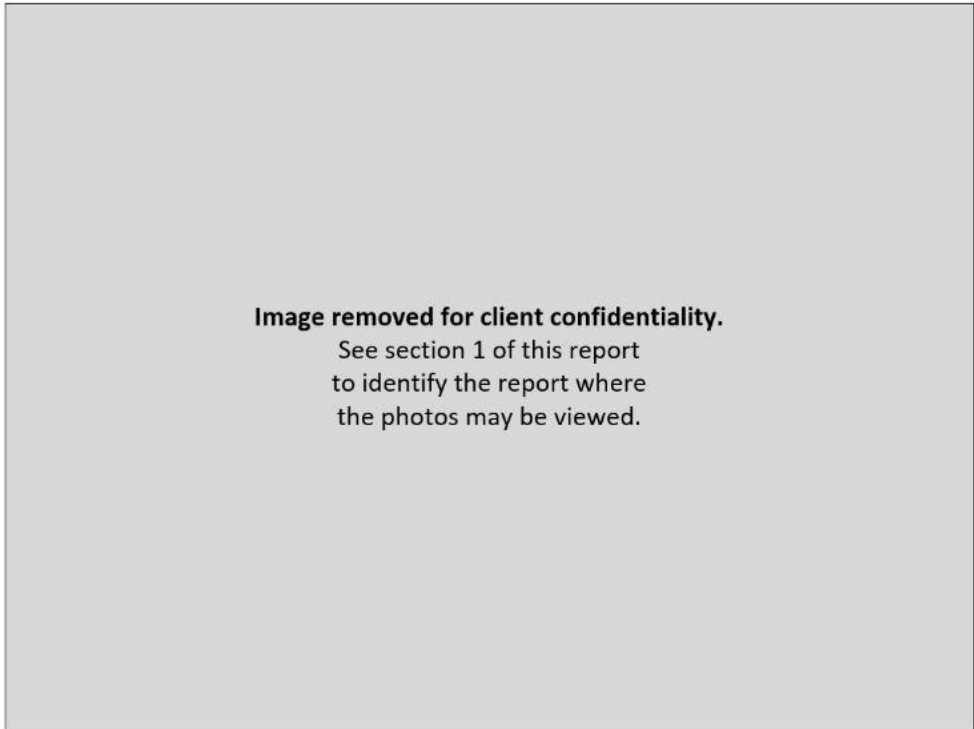


Figure RE07.3: EUT test setup, reverse view

This line is the end of the test record.

Test Record

Conducted Emissions Mains Test CE01

Project GCL0463

Test Date(s) 17 May 2024
Test Personnel Aditya Prakash

Product Model A04884
Serial Number tested 8LY000143

Operating Mode M3 (BleTx)
Arrangement A2 (Upwr)
Input Power 120 V_{AC} 60 Hz

Test Standards: FCC Part 15, ANSI C63.10, RSS-247 (as noted in Section 6 of the report).

Frequency Range: 150 kHz to 30 MHz

Pass/Fail Judgment: PASS

Test record created by: Andy Heier
Date of this record: 23 May 2024

Original record, Version A.

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 44GHz	Keysight	N9048B	MY62220139	13-Mar-2024	15-Mar-2025
LISN multiline; 15A to 9kHz	Com-Power	LI-215A	192027	19-Feb-2024	15-Feb-2027

Table CE01.1: Test Equipment Used

Software Used

Keysight PXE software A.33.03; CE Mains 150kHz to 30M Data Analysis V2 2021Jun10.xlsx

Test Data

The conducted emission test process began with a set of preliminary scans on both power conductors using both Quasi-Peak and Average detectors across the frequency range. Where the test standard requires cable manipulation, one or more likely worst case frequencies selected by the test personnel. Cables were manipulated to find the maximal signal strength while observing the receiver levels at those selected frequencies. At each of the frequencies selected for final measurements, Quasi-peak and Average detector readings were taken on each conductor.

The table shows the selected final measurement data. It includes at least the six strongest emissions observed relative to the limit lines, along with other data points of interest. The yellow highlight indicate the data points with the least margin to the quasi-peak detector limit and the average detector limit. A positive margin value indicates that the emission was below the test limit. The test limit is the Composite FCC/CISPR Class B Limit.

In this test, fewer than six emissions were observed within 20 dB of the limit. The relevant emissions were measured, including one or more noise floor signals as judged appropriate to the spectrum.

Frequency	QP Limit	AV Limit	L1 QP	L2 QP	L1 AV	L2 AV	QP Margin	AV Margin
(kHz)	(dBuV)	(dBuV)	(dBuV)	(dBuV)	(dBuV)	(dBuV)	(dB)	(dB)
164	65.28	55.28	30.57	29.20	22.79	19.86	34.72	32.49
425	57.36	47.36	21.57	22.16	17.72	12.67	35.20	29.64
1678	56.00	46.00	17.55	17.48	12.78	12.62	38.45	33.22

Table CE01.2: Emission summary (BLE)

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The graph below shows preliminary scan data as continuous curves. Superimposed are the final measurement data points reported in the table above.

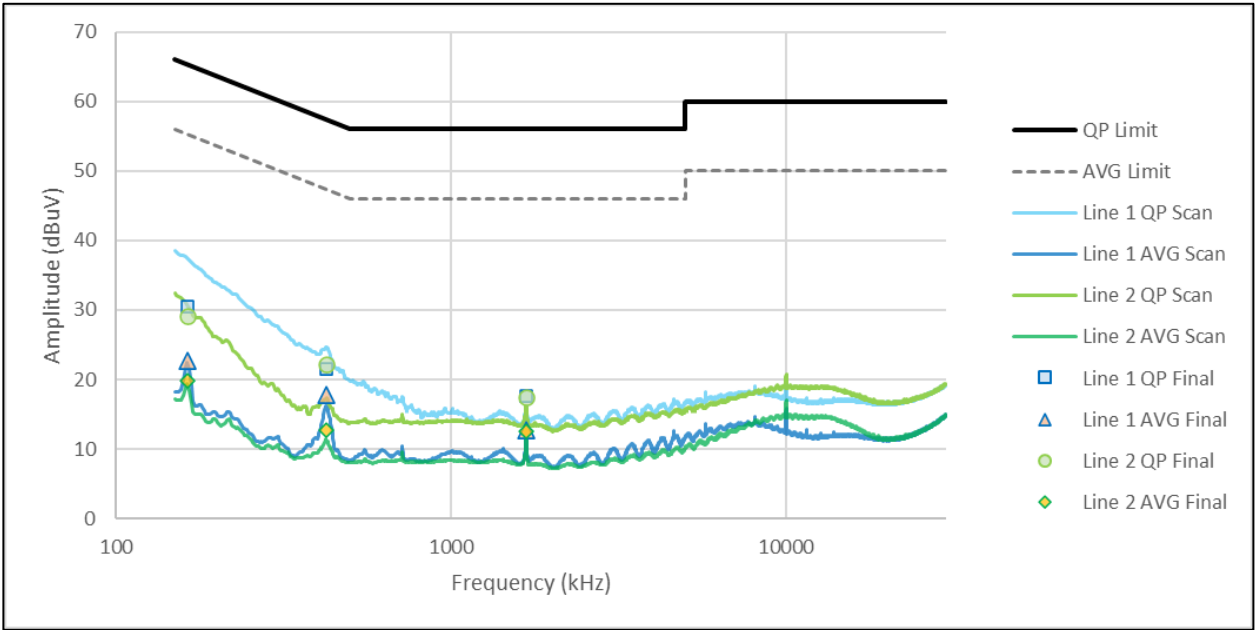


Figure CE01.1: Spectral data (BLE)

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.



Figure CE01.2: Test setup, front view

Image removed for client confidentiality.

See section 1 of this report
to identify the report where
the photos may be viewed.

Figure CE01.3: Test setup, side view

This line is the end of the test record.

Concluding Notes

This report stands as an integrated record of the tests performed and must be copied or distributed in its complete form. The reproduction of selected pages or sections separate from the complete report would require specific approval from the manager of the Garmin Compliance Lab.

This is the final page of the report.