

FCC/ISED Test Report

Prepared for: **Garmin International, Inc.**

Address: **1200 E. 151st Street**
 Olathe, Kansas, 66062, USA

Product: **A04952**

Test Report No: **R20240815-00-E2** **Rev: B**

Approved by:


Fox Lane,
EMC Test Engineer

DATE: **December 6, 2024**

Total Pages: **30**

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REVISION PAGE

Rev. No.	Date	Description
0	18 November 2024	Issued by FLane Reviewed by FLane Prepared by ESchmidt
A	19 November 2024	Added field strength measurement and duty cycle additions – FL
B	6 December 2024	Included statement regarding emissions – FL



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1.0 SUMMARY OF TEST RESULTS

The worst-case measurements were reported in this report. Summary of test results presented in this report correspond to the following section:

The EUT has been tested according to the following specifications:

- (1) US Code of Federal Regulations, Title 47, Part 15.249
- (2) ISED RSS-Gen, Issue 5
- (3) ISED RSS-210, Issue 11

APPLIED STANDARDS AND REGULATIONS		
Standard Section	Test Type	Result
FCC Part 15.35 RSS Gen, Issue 5, Section 6.10	Duty Cycle	Pass
Informational purposes only	Bandwidth	NA
FCC Part 15.209 RSS-Gen Issue 5, Section 7.3	Receiver Radiated Emissions	Pass
FCC Part 15.209 FCC 15.249(a) RSS-210 Issue 11, Annex B.10(a)(b) RSS-Gen Issue 5, Section 6.13	Transmitter Radiated Emissions	Pass
FCC Part 15.209, 15.249(d) RSS-210 Issue 11 Annex B.10(b) RSS-Gen Issue 5, Section 6.13	Band Edge Measurement	Pass
FCC Part 15.207 RSS-Gen Issue 5, Section 8.8	Conducted Emissions	Pass



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2.0 EUT DESCRIPTION

2.1 EQUIPMENT UNDER TEST

Summary and Operating Condition:

EUT	A04952
FCC ID	IPH-04952
IC	1792A-04952
EUT Received	10 September 2024
EUT Tested	19 September 2024- 5 November 2024
Serial No.	3485373849 (Radiated Measurements) 3485373855 (Conducted Measurements)
Operating Band	2400 – 2483.5 MHz
Device Type	<input type="checkbox"/> GMSK <input checked="" type="checkbox"/> GFSK <input type="checkbox"/> BT BR <input type="checkbox"/> BT EDR 2MB <input type="checkbox"/> BT EDR 3MB <input type="checkbox"/> 802.11x
Power Supply / Voltage	Internal Battery / 5VDC Charger: Garmin (Phi Hong) Model: AQ27A-59CFA GPN: 362-00118-00 (Representative Power Supply)

NOTE: For more detailed features description, please refer to the manufacturer's specifications or user's manual.

2.2 DESCRIPTION OF TEST MODES

The operating range of the EUT is dependent on the device type found in section 2.1:

GFSK Transmissions

Channel	Frequency
Low	2402 MHz
Mid	2440 MHz
High	2480 MHz

These are the only representative channels tested in the frequency range according to FCC Part 15.31 and RSS-Gen Table A1. See the operational description for a list of all channel frequency and designations.

2.3 DESCRIPTION OF SUPPORT UNITS

None

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3.0 LABORATORY AND GENERAL TEST DESCRIPTION

3.1 LABORATORY DESCRIPTION

All testing was performed at the following Facility:

The Nebraska Center for Excellence in Electronics (NCEE Labs)
 4740 Discovery Drive
 Lincoln, NE 68521
 A2LA Certificate Number: 1953.01
 FCC Accredited Test Site Designation No: US1060
 Industry Canada Test Site Registration No: 4294A
 NCC CAB Identification No: US0177

Environmental conditions varied slightly throughout the tests:

Relative humidity of $35 \pm 4\%$
 Temperature of $22 \pm 3^\circ$ Celsius



3.2 TEST PERSONNEL

No.	PERSONNEL	TITLE	ROLE
1	Fox Lane	Test Engineer	Testing and Report
2	Blake Winter	Test Engineer	Testing
3	Ethan Schmidt	Test Engineer	Testing and Report
4	Karthik Vepuri	Technical Manager	Review

Notes: All personnel are permanent staff members of NCEE Labs. No testing or review was sub-contracted or performed by sub-contracted personnel.



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3.3 TEST EQUIPMENT

DESCRIPTION AND MANUFACTURER	MODEL NO.	SERIAL NO.	LAST CALIBRATION DATE	CALIBRATION DUE DATE
Keysight MXE Signal Analyzer (44GHz)	N9038A	MY59050109	July 17, 2024	July 18, 2026
Keysight MXE Signal Analyzer (26.5GHz)	N9038A	MY56400083	July 17, 2024	July 18, 2026
Keysight EXA Signal Analyzer	N9010A	MY56070862	July 18, 2023	July 17, 2025
SunAR RF Motion	JB1	A082918-1	July 17, 2024	July 17, 2025
EMCO Horn Antenna	3117	29616	June 12, 2024	June 12, 2025
Com-Power LISN, Single Phase	LI-220C	20070017	July 17, 2023	July 17, 2025
Agilent Preamp*	87405A	3207A01475	May 2, 2024	May 2, 2026
ETS Red Preamplifier (Orange)*	3115-PA	00218576	January 22, 2024	January 22, 2026
Trilithic High Pass Filter*	6HC330	23042	June 5, 2023	June 5, 2025
ETS – Lindgren- VSWR on 10m Chamber	10m Semi-anechoic chamber-VSWR	4740 Discovery Drive	May 15, 2024	May 15, 2027
NCEE Labs-NSA on 10m Chamber*	10m Semi-anechoic chamber-NSA	NCEE-001	May 22, 2024	May 22, 2026
RF Cables (3m Ant. to Control room Bulkhead)	MFR-57500	1E3874	June 5, 2023	June 5, 2025
RF Cable (antenna to 10m chamber bulkhead)*	FSCM 64639	01E3872	June 5, 2023	June 5, 2025
RF Cable (10m chamber bulkhead to control room bulkhead)*	FSCM 64639	01E3874	June 5, 2023	June 5, 2025
RF Cable (control room bulkhead to test receiver)*	FSCM 64639	01F1206	June 5, 2023	June 5, 2025
N connector bulkhead (10m chamber)*	PE9128	NCEEBH1	June 5, 2023	June 5, 2025
N connector bulkhead (control room)*	PE9128	NCEEBH2	June 5, 2023	June 5, 2025
TDK Emissions Lab Software	V11.25	700307	NA	NA

*Internal Characterization

Notes:

All equipment is owned by NCEE Labs and stored permanently at NCEE Labs facilities.

3.4 GENERAL TEST PROCEDURE AND SETUP FOR RADIO MEASUREMENTS

Measurement type presented in this report (Please see the checked box below):

Conducted

The conducted measurements were performed by connecting the output of the transmitter directly into a spectrum analyzer using an impedance matched cable and connector soldered to the EUT in place of the antenna. The information regarding resolution bandwidth, video bandwidth, span and the detector used can be found in the graphs provided in Appendix C. All the radio measurements were performed using the sections from ANSI C63.10, details about the section used can be found in the spectrum analyzer titles on the graph.

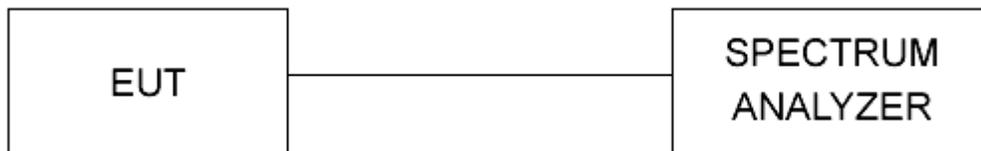


Figure 1 - Bandwidth Measurements Test Setup

Radiated

All the radiated measurements were taken at a distance of 3m from the EUT. The information regarding resolution bandwidth, video bandwidth, span and the detector used can be found in the graphs provided in Appendix C. All the radio measurements were performed using the sections from ANSI C63.10, details about the section used can be found in the spectrum analyzer titles on the graph.

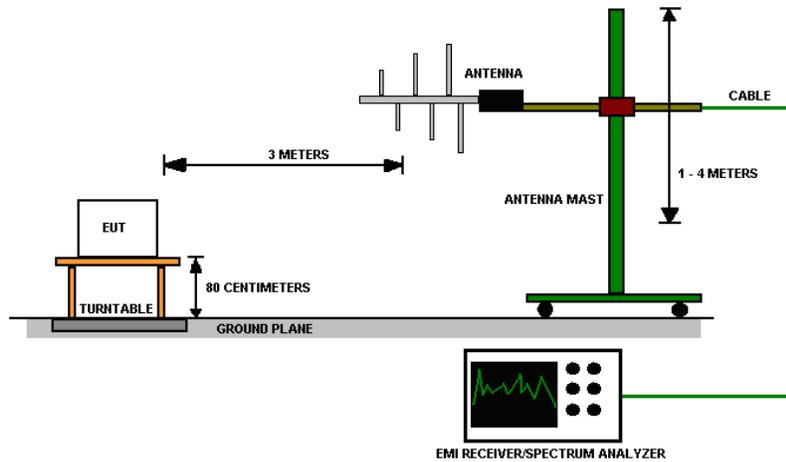


Figure 2 - Radiated Emissions Test Setup

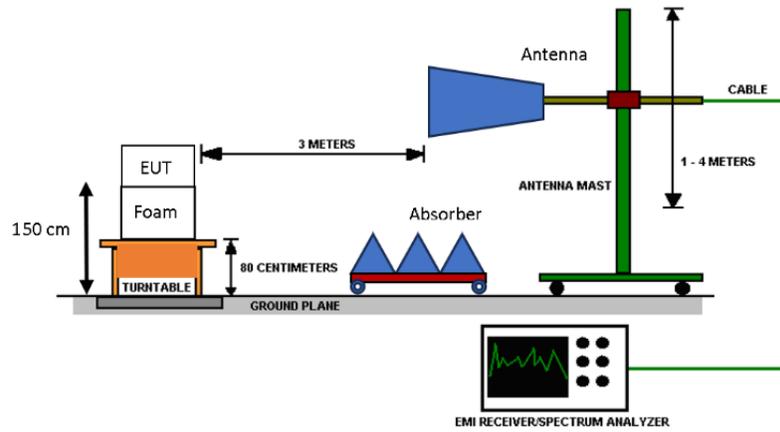


Figure 3 - Radiated Emissions Test Setup, >1GHz



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4.0 RESULTS

Peak Restricted Band-Edge							
CH	Mode	Band edge /Measurement Frequency (MHz)	Highest out of band level (dBuV/m @ 3m)	Detector	Limit (dBuV/m @ 3m)	Margin	Result
Low	ANT GFSK	2390.00	54.027	Peak	73.98	19.95	PASS
High	ANT GFSK	2483.50	61.114	Peak	73.98	12.87	PASS

*Limit shown is the average limit taken from FCC Part 15.209

Average Restricted Band-Edge								
CH	Mode	Band edge /Measurement Frequency (MHz)	Avg Out of Band Level (dBuV/m @ 3m)	DCCF for Emissions (dB)	Corrected Out of band level (dBuV/m @ 3m)	Limit (dBuV/m @ 3m)	Margin	Result
Low	ANT GFSK	2390.00	43.137	0.466	43.60	53.98	10.38	PASS
High	ANT GFSK	2483.50	43.219	0.466	43.68	53.98	10.30	PASS

*Limit shown is the average limit taken from FCC Part 15.209

Unrestricted Band-Edge							
CH	Mode	Band edge /Measurement Frequency (MHz)	Relative Highest out of band level (dBm)	Relative Fundamental (dBm)	Delta (dB)	Min Delta (dB)	Result
Low	ANT GFSK	2400.00	59.414	110.183	50.77	50.00	PASS
High	ANT GFSK	2483.50	53.905	110.009	53.905	50.00	PASS

DTS Radio Measurements			
CHANNEL	Transmitter	Occupied Bandwidth (kHz)	RESULT
Low	ANT GFSK	984.77	PASS
Mid	ANT GFSK	984.16	PASS
High	ANT GFSK	986.41	PASS

Occupied Bandwidth = N/A; 6 dB Bandwidth Limit = N/A

4.1 DUTY CYCLE

Test Method:

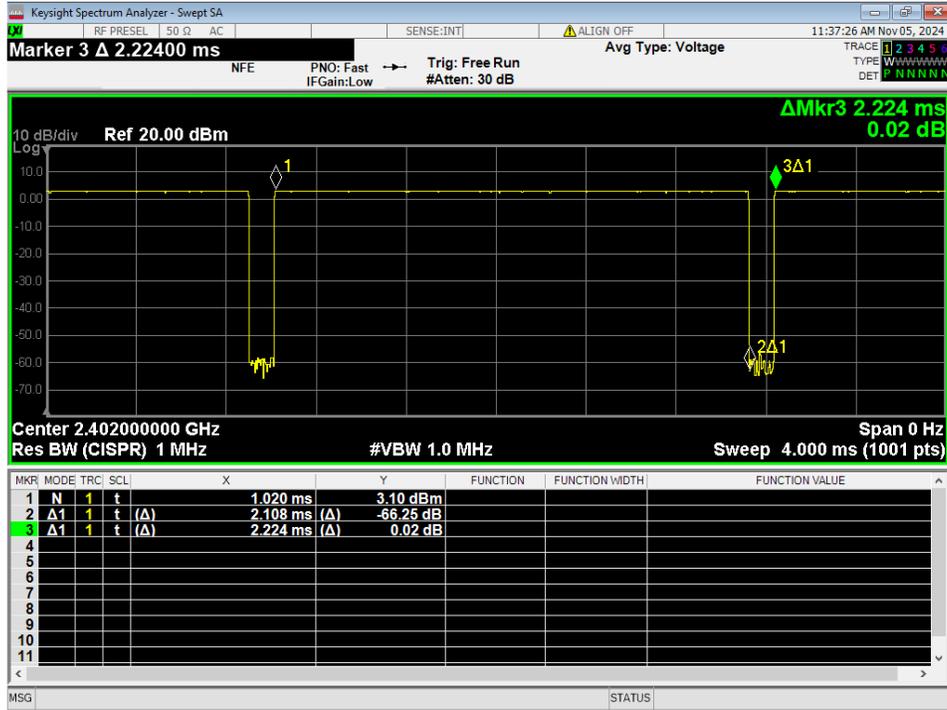


Figure 4 – Duty Cycle, GFSK

The following duty cycle and duty cycle correction factors (DCCF) were used.

Duty Cycle correction factor (for emissions) = $20 \cdot \log(1 / \text{Duty cycle})$

Duty Cycle correction factor (for power) = $10 \cdot \log(1 / \text{Duty Cycle})$

Duty cycle for GFSK: **0.948**

Duty cycle correction factor (for emissions) for GFSK: **0.466dB**

Duty Cycle correction factor (for power) for GFSK: **0.233dB**

Manufacturers' declared duty cycle will be no higher than 13% for real world use, and the previous duty cycle is achieved only in test mode software.

Duty Cycle declared

DCCF(Declared) = $20 \cdot \log(1/0.13) = 17.72\text{dB}$

4.2 RADIATED EMISSIONS

Test Method: ANSI C63.10-2013, Section 6.5, 6.6

Limits for radiated emissions measurements:

Emissions radiated outside of the specified bands shall be applied to the limits in 15.209 as followed:

FREQUENCIES (MHz)	FIELD STRENGTH ($\mu\text{V/m}$)	MEASUREMENT DISTANCE (m)
0.009-0.490	2400/F(kHz)	300
0.490-1.705	24000/F(kHz)	30
1.705-30.0	30	3
30-88	100	3
88-216	150	3
216-960	200	3
Above 960	500	3

NOTE:

1. The lower limit shall apply at the transition frequencies.
2. Emission level (dBuV/m) = $20 * \log * \text{Emission level } (\mu\text{V/m})$.
3. As shown in 15.35(b), for frequencies above 1000MHz, the field strength limits are based on average detector, however, the peak field strength of any emission shall not exceed the maximum permitted average limits by more than 20dB under any condition of modulation.
4. The EUT was tested for spurious emissions while running off of battery power and external USB power. The worse-case emissions were produced while running off of USB power, so results from this mode are presented.
5. Intermodulation was investigated and found to be below system noise floor



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Test procedures:

- a. The EUT was placed on the top of a rotating table above the ground plane in a 10 meter semi-anechoic chamber. The table was rotated 360 degrees to determine the position of the highest radiation. The table was 0.8m high for measurements from 30MHz-1Ghz and 1.5m for measurements from 1GHz and higher.
- b. The EUT was set 3 meters away from the interference-receiving antenna, which was mounted on the top of a variable-height antenna tower.
- c. The antenna was a broadband antenna, and its height is varied from one meter to four meters above the ground to determine the maximum value of the field strength. Both horizontal and vertical polarizations of the antenna are used to make the measurement.
- d. For each suspected emission, the EUT was arranged to maximize its emissions and then the antenna height was varied from 1 meter to 4 meters and the rotating table was turned from 0 degrees to 360 degrees to find the maximum emission reading.
- e. The test-receiver system was set to use a peak detector with a specified resolution bandwidth. For spectrum analyzer measurements, the composite maximum of several analyzer sweeps was used for final measurements.
- f. If the emission level of the EUT in peak mode was 10dB lower than the limit specified, then testing could be stopped and the peak values of the EUT would be reported. Otherwise the emissions that did not have 10 dB margin would be re-tested one by one using peak, quasi-peak or average method as specified and then reported in a data sheet.
- g. The EUT was maximized in all 3 orthogonal positions. The results are presented for the axis that had the highest emissions.

NOTE:

- 1. The resolution bandwidth and video bandwidth of test receiver/spectrum analyzer is 120kHz for Peak detection (PK) and Quasi-peak detection (QP) at frequencies below 1GHz.
- 2. The resolution bandwidth 1 MHz for all measurements and at frequencies above 1GHz, A peak detector was used for all measurements above 1GHz. Measurements were made with an EMI Receiver.

Deviations from test standard:

No deviation.

EUT operating conditions

Details can be found in section 2.1 of this report.

Test results:

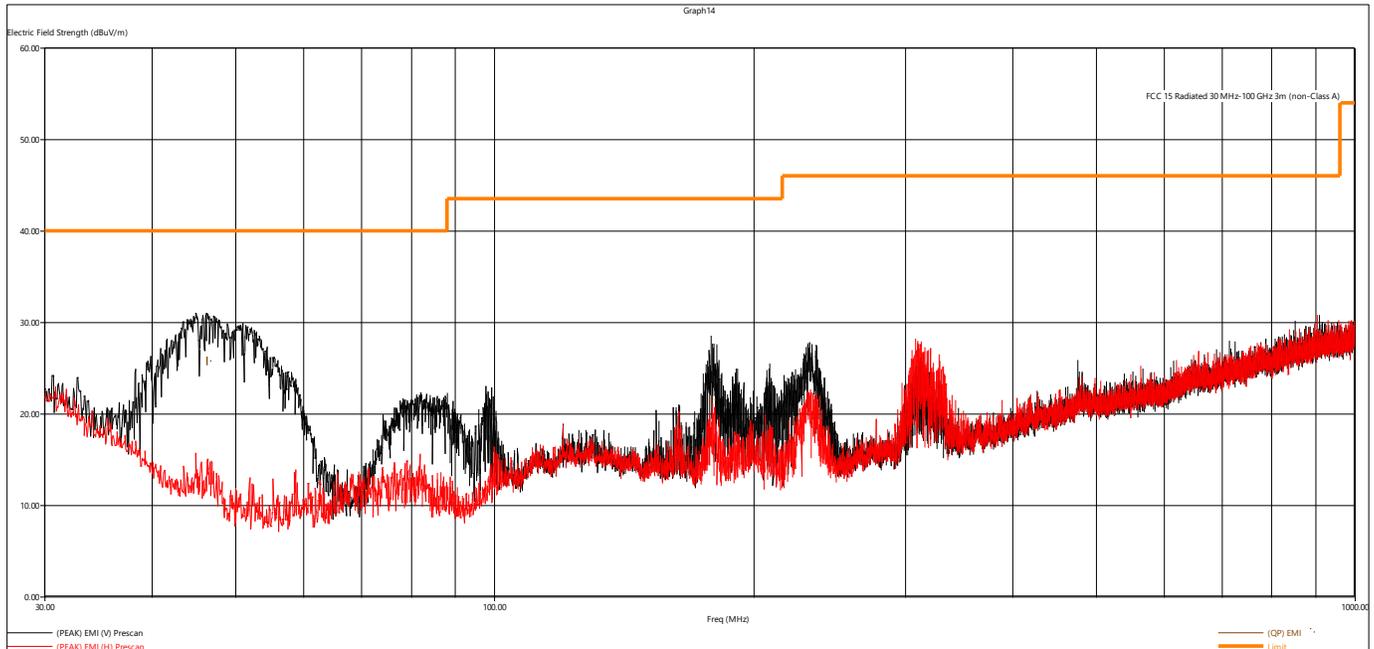


Figure 5 - Radiated Emissions Plot, Receive

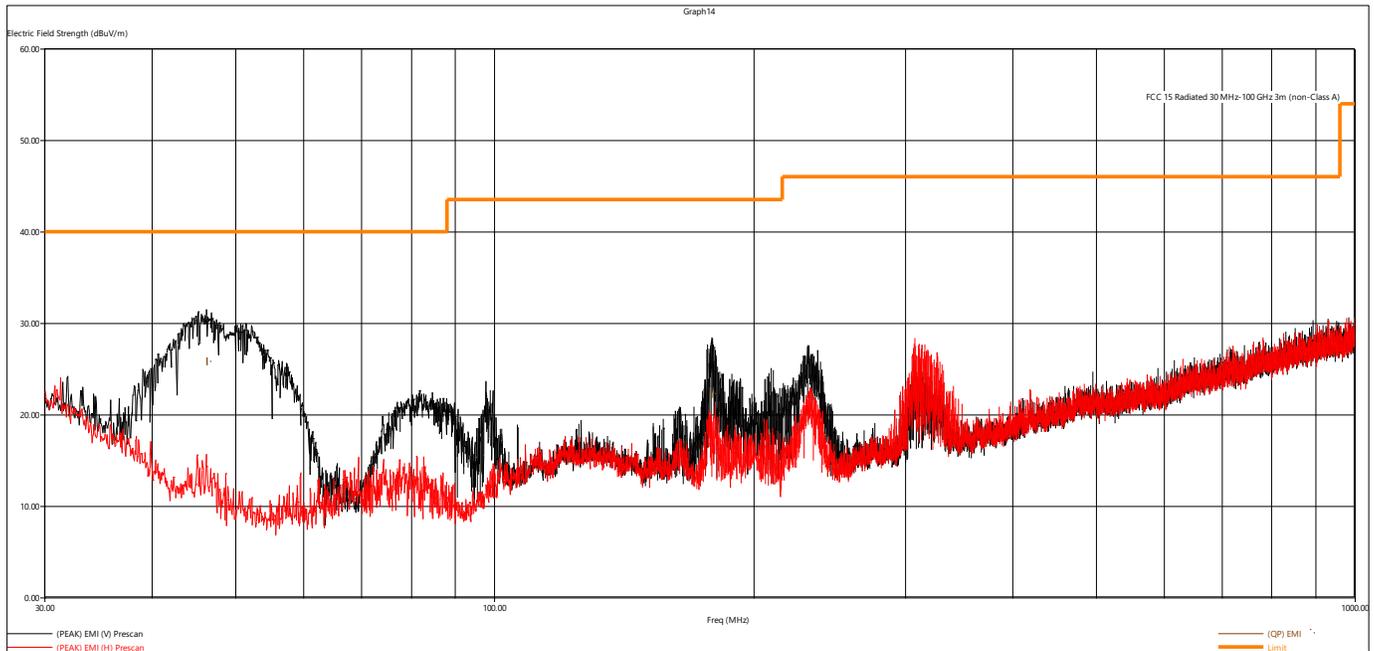


Figure 6 - Radiated Emissions Plot, GFSK, Low Channel

REMARKS:

1. Emission level (dBuV/m) = Raw Value (dBuV) + Correction Factor (dB)
2. Correction Factor (dB/m) = Antenna Factor (dB/m) + Cable Factor (dB)
3. The other emission levels were very low against the limit.
4. Margin value = Limit value - Emission level



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Quasi-Peak Measurements, GFSK								
Frequency	Level	Limit	Margin	Height	Angle	Pol	Channel	Modulation
MHz	dB μ V/m	dB μ V/m	dB	cm.	deg.			
46.312320	25.78	40.00	14.22	104.08	290.50	V	Low	GFSK
178.682160	22.30	43.52	21.22	106.83	112.50	V	Low	GFSK
46.301280	25.67	40.00	14.33	107.07	235.00	V		RX
178.580640	21.46	43.52	22.06	118.95	143.75	V		RX

The EUT was maximized in all 3 orthogonal axes. The worst-case is shown in the plot and table above.

Peak Measurements, GFSK								
Frequency	Level	Limit	Margin	Height	Angle	Pol	Channel	Modulation
MHz	dB μ V/m	dB μ V/m	dB	cm.	deg.			
2402.112000	102.12	114.00	11.88	400.50	163.50	H	Low	GFSK
2440.052000	101.74	114.00	12.26	289.22	157.75	H	Mid	GFSK
2480.010000	101.07	114.00	12.93	237.70	163.00	H	High	GFSK

Average Measurements, GFSK								
Frequency	Level	Limit	Margin	Height	Angle	Pol	Channel	Modulation
MHz	dB μ V/m	dB μ V/m	dB	cm.	deg.			
2402.112000	84.4	94.00	9.60	400.50	163.50	H	Low	GFSK
2440.052000	84.02	94.00	9.98	289.22	157.75	H	Mid	GFSK
2480.010000	83.35	94.00	10.65	237.70	163.00	H	High	GFSK

Average level = Peak Level – DCCF(Declared)
See section 4.1 for more information regarding DCCF

All other emissions were found to be below the system's noise floor.



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4.3 BAND EDGES

Test Method: All the radio measurements were performed using the sections from ANSI C63.10, details about the section used can be found in the spectrum analyzer titles on the graph.

Limits of band-edge measurements:

For FCC Part 15.249 Device:

Emissions radiated outside of the specified frequency bands, except for harmonics, shall be attenuated by at least 50 dB below the level of the fundamental or to the general radiated emission limits in § 15.209, whichever is the lesser attenuation.

Test procedures:

The highest emissions level beyond the band-edge was measured and recorded. All band edge measurements were evaluated to the general limits in Part 15.209. More details can be found in section 3.4 of this report.

Deviations from test standard:

No deviation.

Test setup:

Test setup details can be found in section 3.4 of this report.

EUT operating conditions:

Details can be found in section 2.1 of this report.

Test results:

Pass

Comments:

1. All the band edge plots can be found in Appendix C.
2. If the device falls under FCC Part 15.249 (Details can be found in summary of test results), compliance is shown in the unrestricted band edges by showing compliance with 15.209.
3. The restricted band edge compliance is shown by comparing to the general limit defined in Part 15.209.
4. Tabulated data is listed in section 4.0.

4.4 CONDUCTED AC MAINS EMISSIONS

Test Method: ANSI C63.10-2013, Section(s) 6.2

Limits for conducted emissions measurements:

FREQUENCY OF EMISSION (MHz)	CONDUCTED LIMIT (dB μ V)	
	Quasi-peak	Average
0.15-0.5	66 to 56	56 to 46
0.5-5	56	46
5-30	60	50

Notes:

1. The lower limit shall apply at the transition frequencies.
2. The limit decreases in line with the logarithm of the frequency in the range of 0.15 to 0.50 MHz
3. All emanations from a class A/B digital device or system, including any network of conductors and apparatus connected thereto, shall not exceed the level of field strengths specified above.

Test Procedures:

- a. The EUT was placed 0.8m above a ground reference plane and 0.8 meters from the conducting wall of a shielded room with EUT being connected to the power mains through a line impedance stabilization network (LISN). The LISN provides 50 ohm/ 50uH of coupling impedance for the measuring instrument.
- b. Both lines of the power mains connected to the EUT were checked for maximum conducted interference as well as the ground.
- c. The frequency range from 150 kHz to 30 MHz was searched. Emission levels over 10dB under the prescribed limits are not reported.
- d. Results were compared to the 15.207 limits.

Deviation from the test standard:

No deviation

EUT operating conditions:

Details can be found in section 2.1 of this report.

Test Results:



Figure 7 - Conducted Emissions Plot, Line, TX

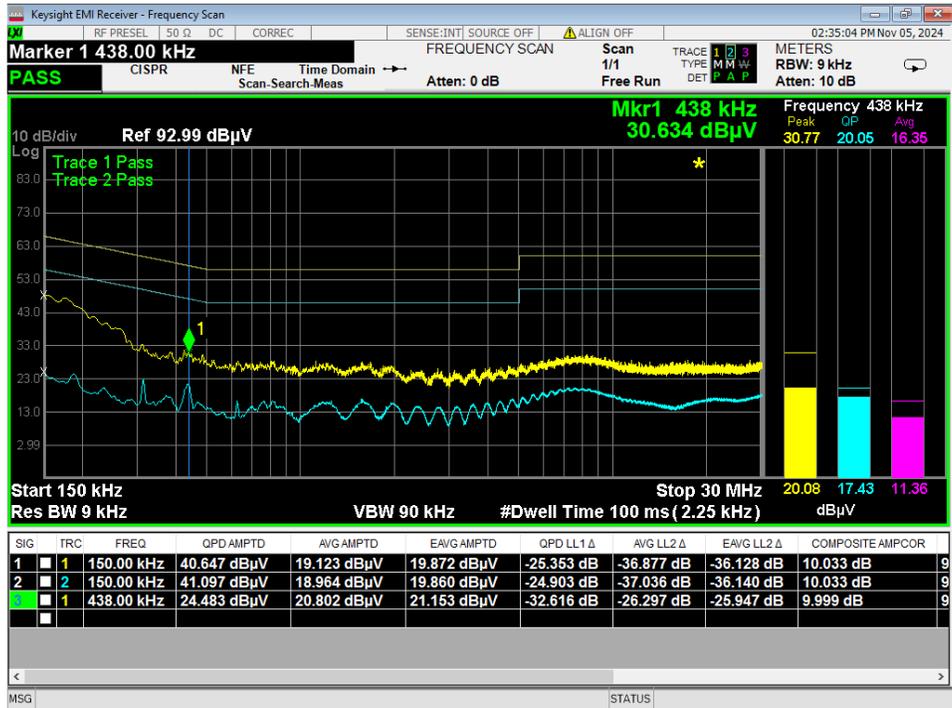


Figure 8 - Conducted Emissions Plot, Neutral, TX



Figure 9 - Conducted Emissions Plot, Line, IDLE

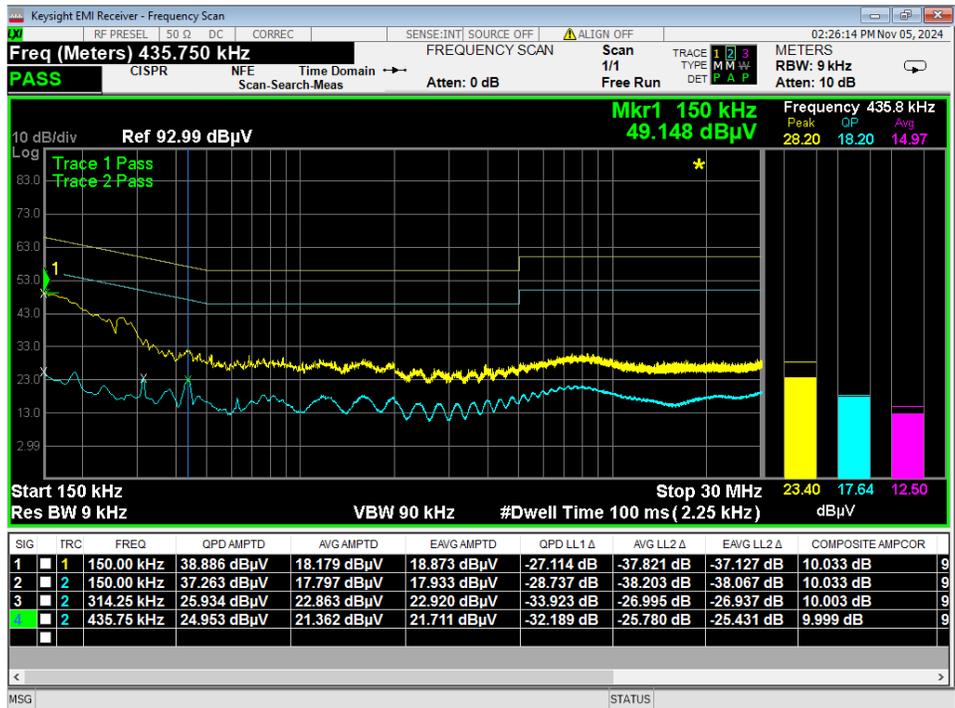


Figure 10 - Conducted Emissions Plot, Neutral, IDLE



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APPENDIX A: SAMPLE CALCULATION

Field Strength Calculation

The field strength is calculated by adding the Antenna Factor and Cable Factor, and subtracting the Amplifier Gain (if any) from the measured reading. The basic equation with a sample calculation is as follows:

$$FS = RA + AF - (-CF + AG) + AV$$

- where FS = Field Strength
- RA = Receiver Amplitude
- AF = Antenna Factor
- CF = Cable Attenuation Factor
- AG = Amplifier Gain
- AV = Averaging Factor (if applicable)

Assume a receiver reading of 55 dBμV is obtained. The Antenna Factor of 12 and a Cable Factor of 1.1 is added. The Amplifier Gain of 20 dB is subtracted, giving a field strength of 48.1 dBμV/m.

$$FS = 55 + 12 - (-1.1 + 20) + 0 = 48.1 \text{ dB}\mu\text{V/m}$$

The 48.1 dBμV/m value can be mathematically converted to its corresponding level in μV/m.

$$\text{Level in } \mu\text{V/m} = \text{Common Antilogarithm} [(48.1 \text{ dB}\mu\text{V/m})/20] = 254.1 \mu\text{V/m}$$

AV is calculated by taking the $20 \cdot \log(T_{on}/100)$ where T_{on} is the maximum transmission time in any 100ms window.

EIRP Calculations

In cases where direct antenna port measurement is not possible or would be inaccurate, output power is measured in EIRP. The maximum field strength is measured at a specified distance and the EIRP is calculated using the following equation;

- EIRP (Watts) = [Field Strength (V/m) x antenna distance (m)]² / 30*
- Power (watts) = 10[^][Power (dBm)/10] / 1000*
- Voltage (dBμV) = Power (dBm) + 107 (for 50Ω measurement systems)*
- Field Strength (V/m) = 10[^][Field Strength (dBμV/m) / 20] / 10[^]6*
- Gain = 1 (numeric gain for isotropic radiator)*
- Conversion from 3m field strength to EIRP (d=3):*

$$EIRP = [FS(V/m) \times d^2]/30 = FS [0.3] \quad \text{for } d = 3$$

$$EIRP(dBm) = FS(dB\mu V/m) - 10(\log 10^9) + 10\log[0.3] = FS(dB\mu V/m) - 95.23$$

10log(10^9) is the conversion from micro to milli



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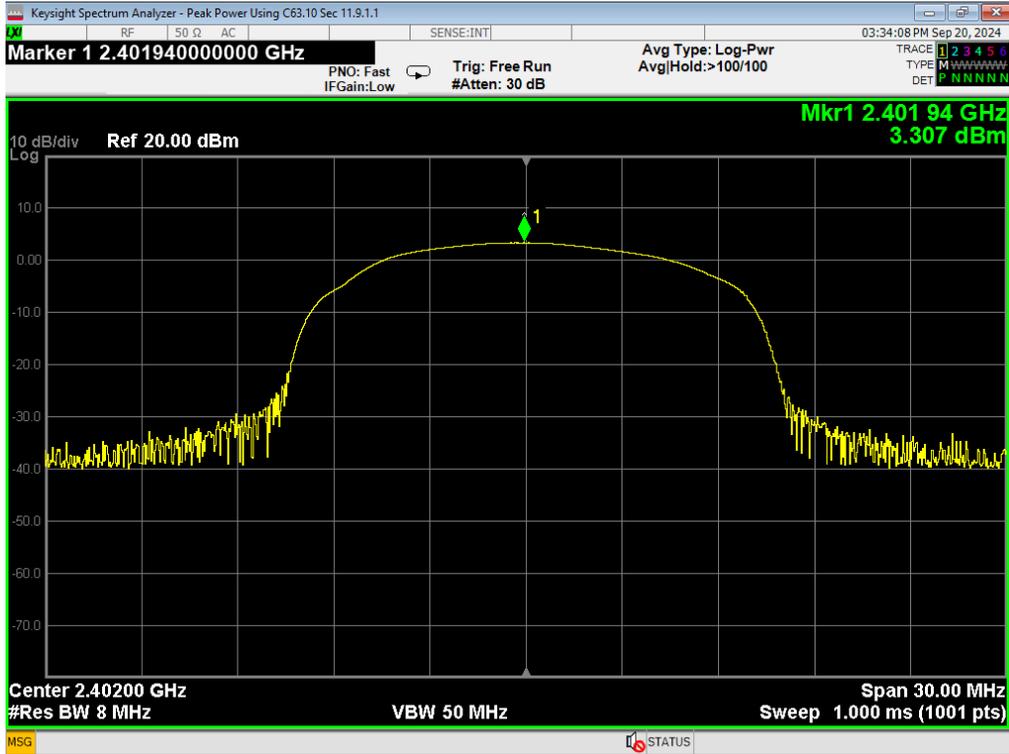
APPENDIX B – MEASUREMENT UNCERTAINTY

Where relevant, the following measurement uncertainty levels have been for tests performed in this test report:

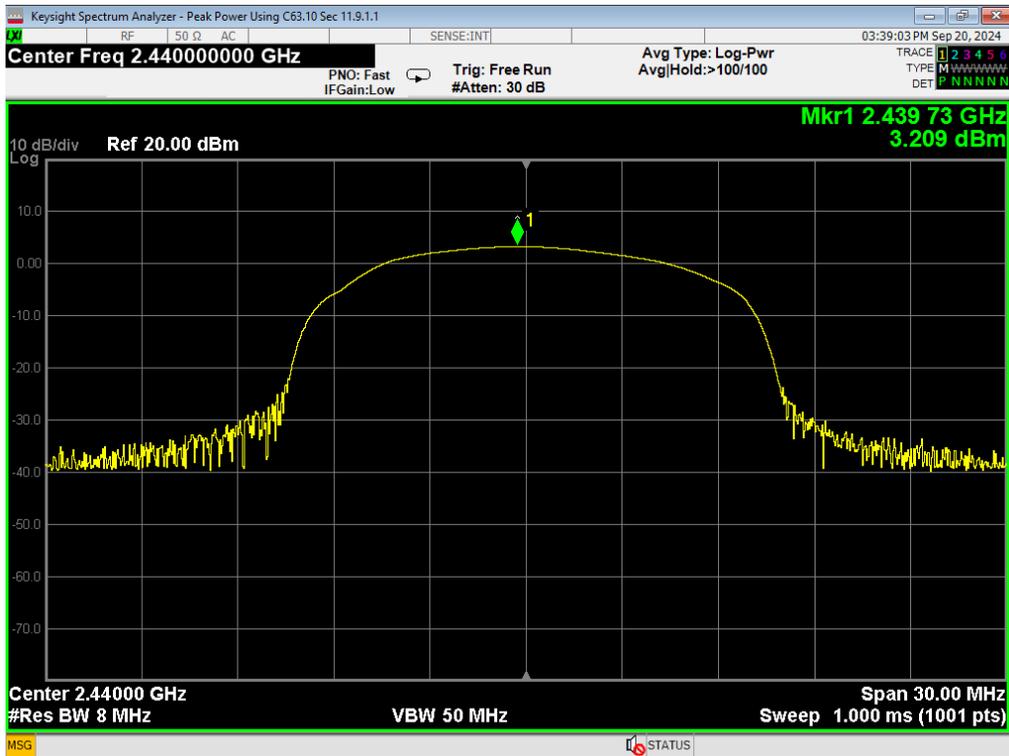
Test	Frequency Range	Uncertainty Value (dB)
Radiated Emissions, 3m	30MHz - 1GHz	±4.31
Radiated Emissions, 3m	1GHz - 18GHz	±5.08
Emissions limits, conducted	30MHz – 18GHz	±3.03

Expanded uncertainty values are calculated to a confidence level of 95%.

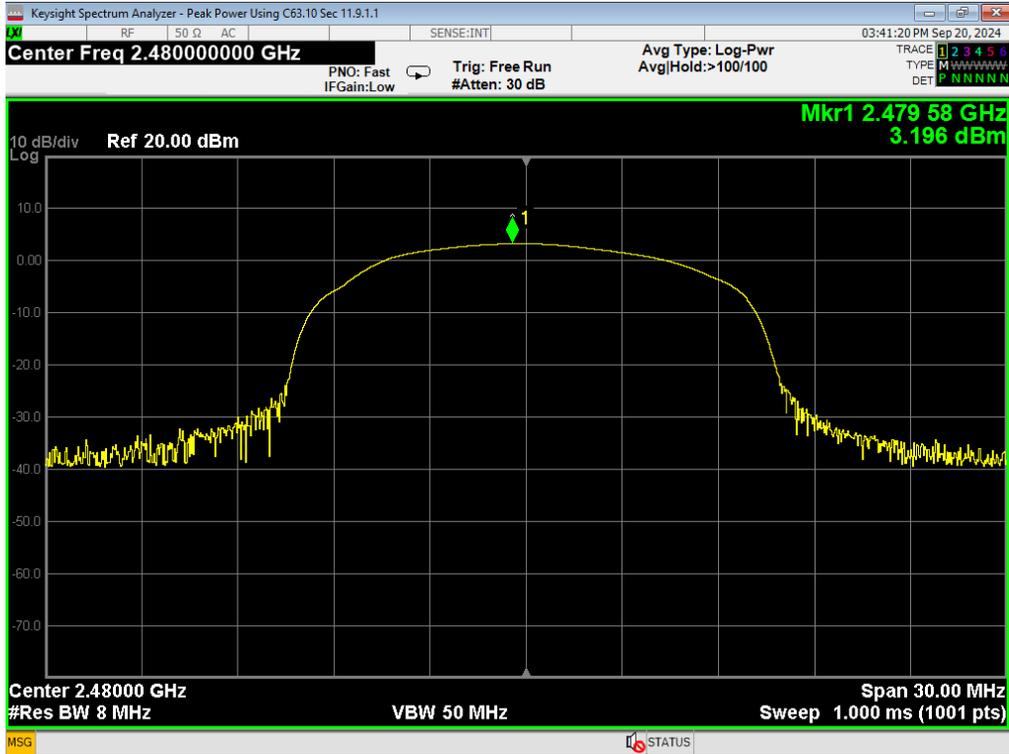
APPENDIX C – GRAPHS AND TABLES



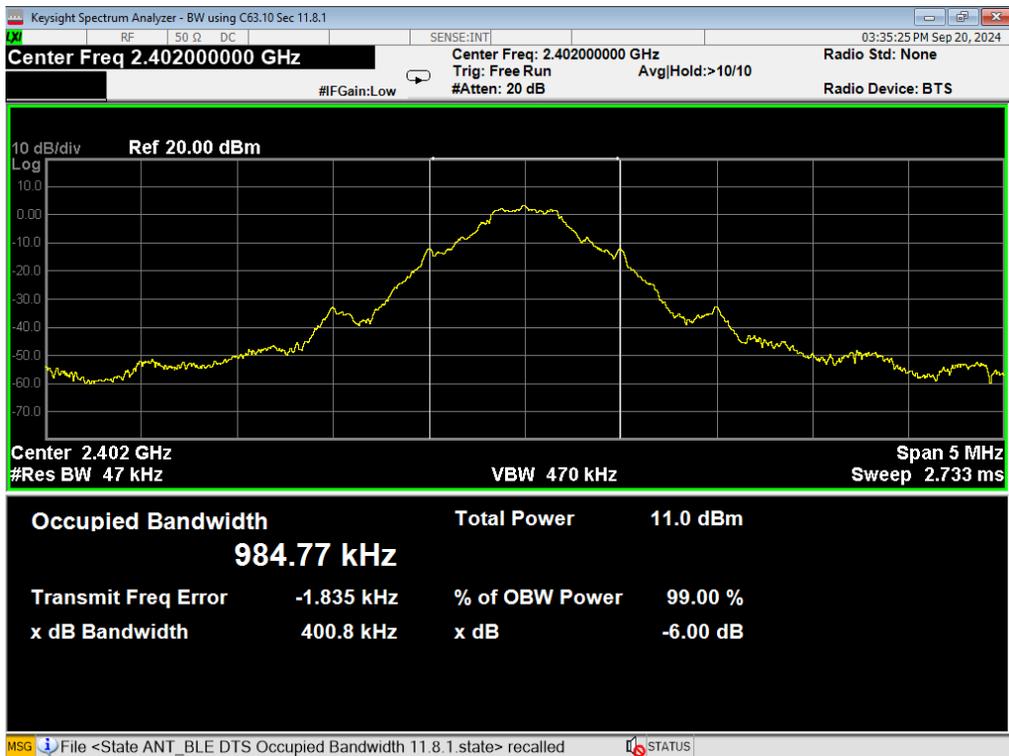
01 Peak Power, ANT GFSK, Low



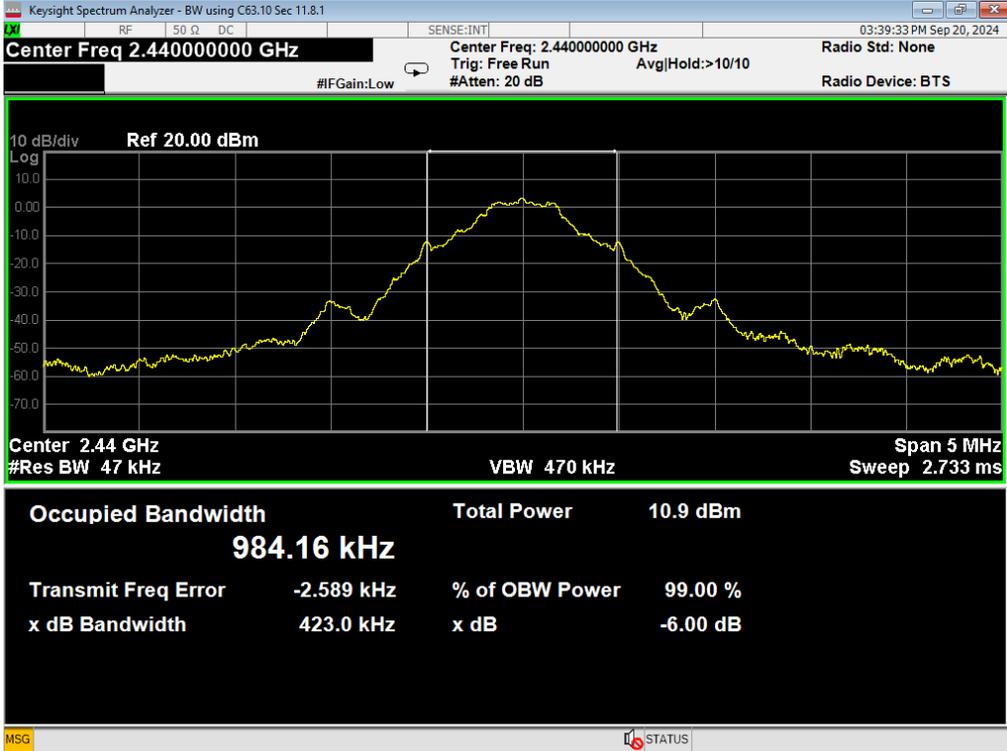
02 Peak Power, ANT GFSK, Mid



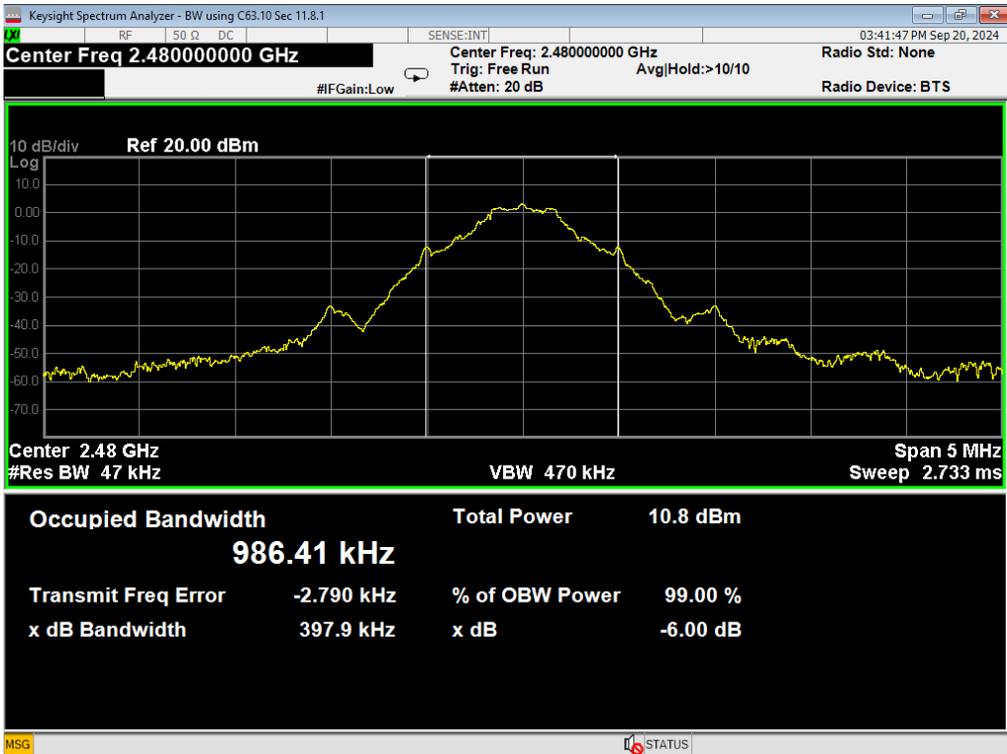
03 Peak Power, ANT GFSK, High



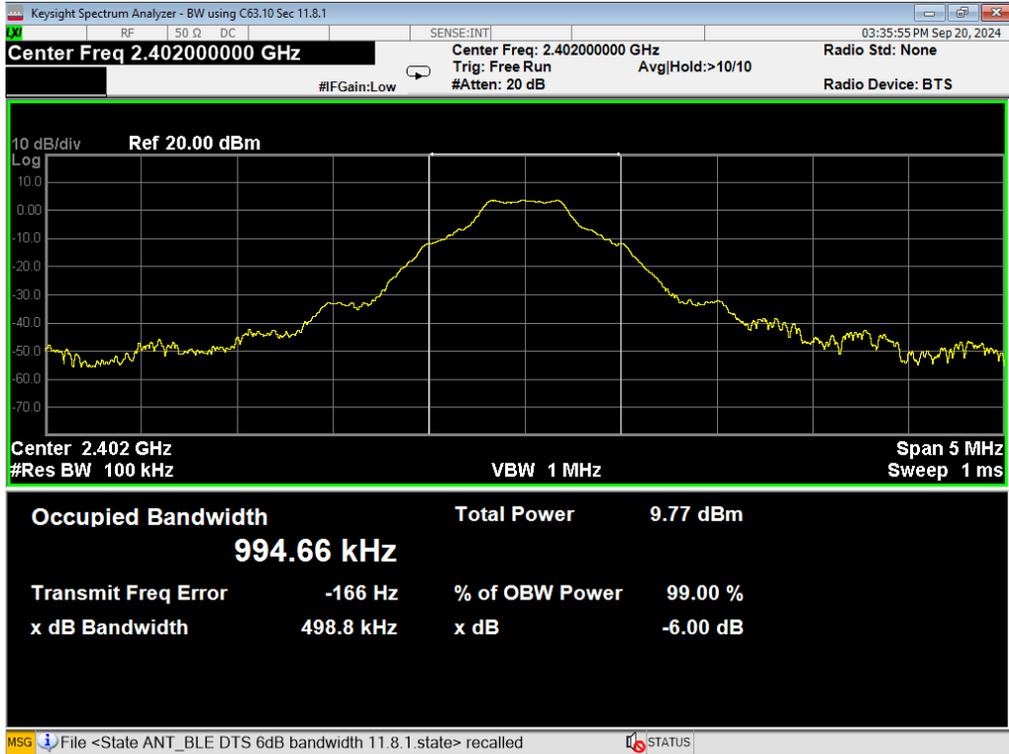
04 Occupied BW, ANT GFSK, Low



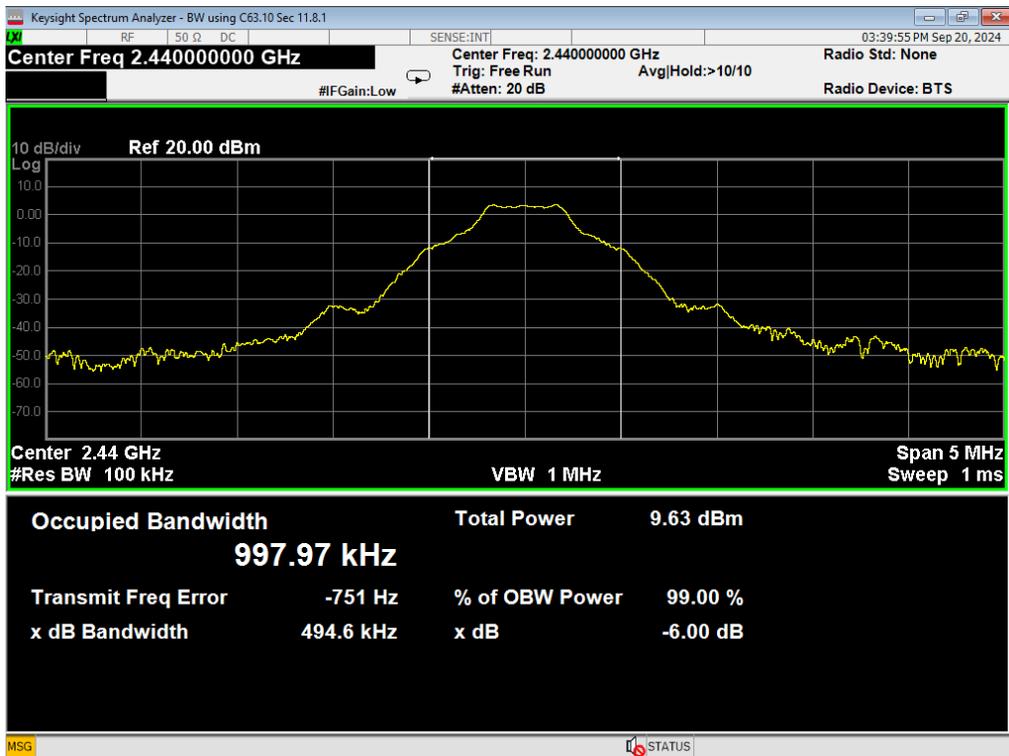
05 Occupied BW, ANT GFSK, Mid



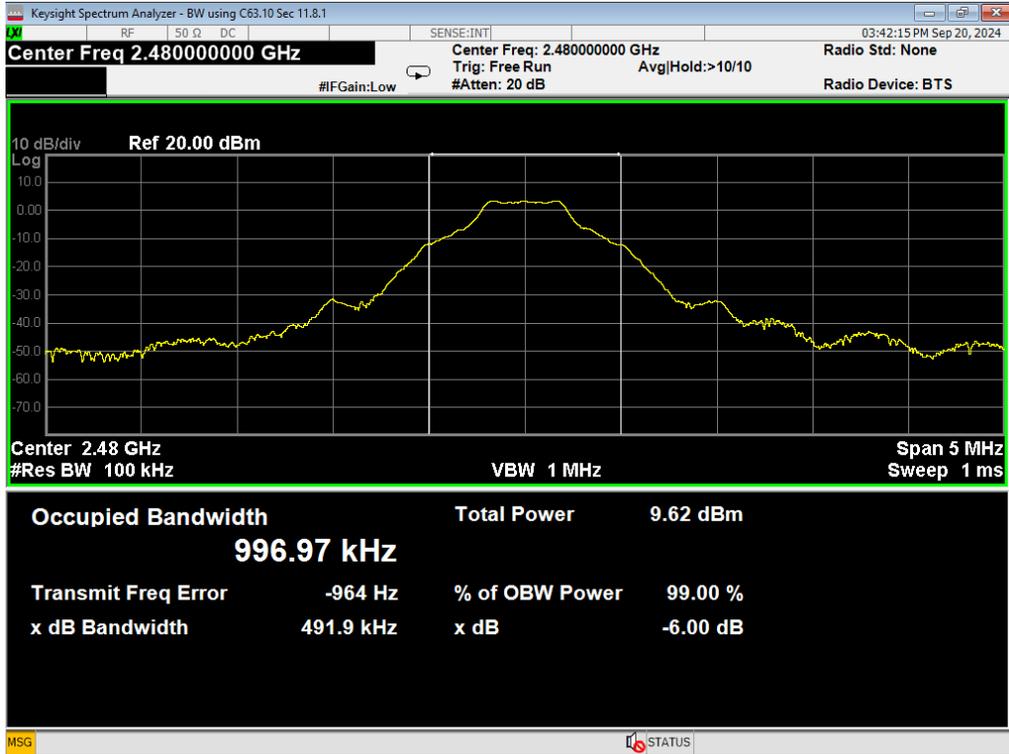
06 Occupied BW, ANT GFSK, High



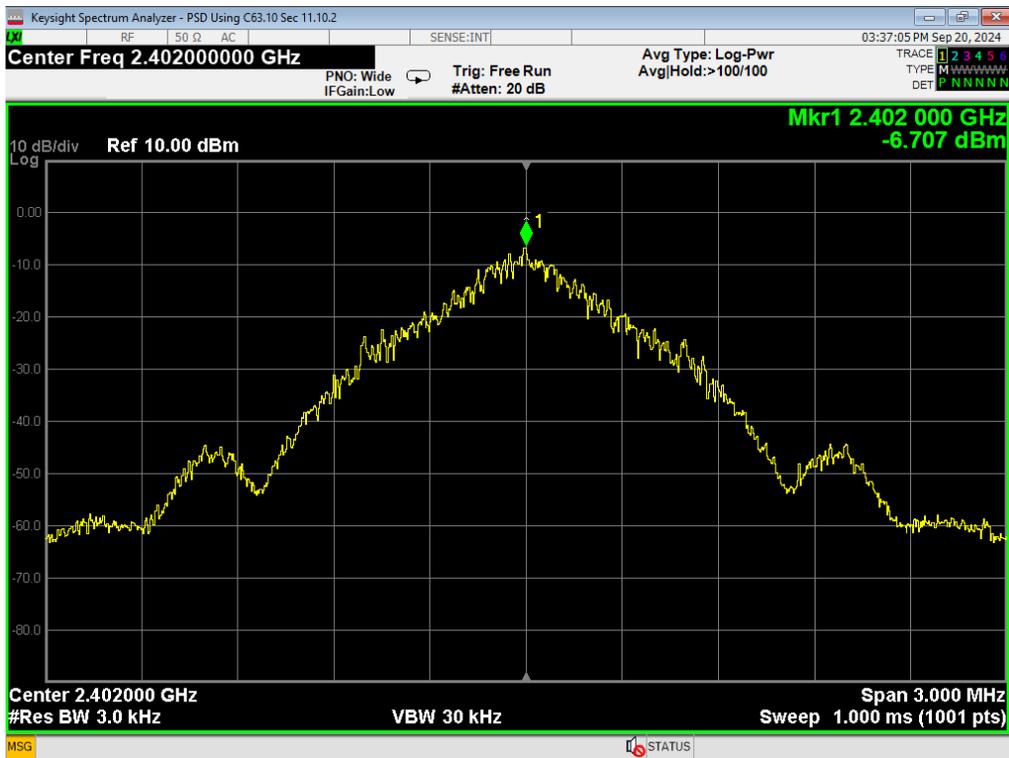
07 6dB BW, ANT GFSK, Low



08 6dB BW, ANT GFSK, Mid



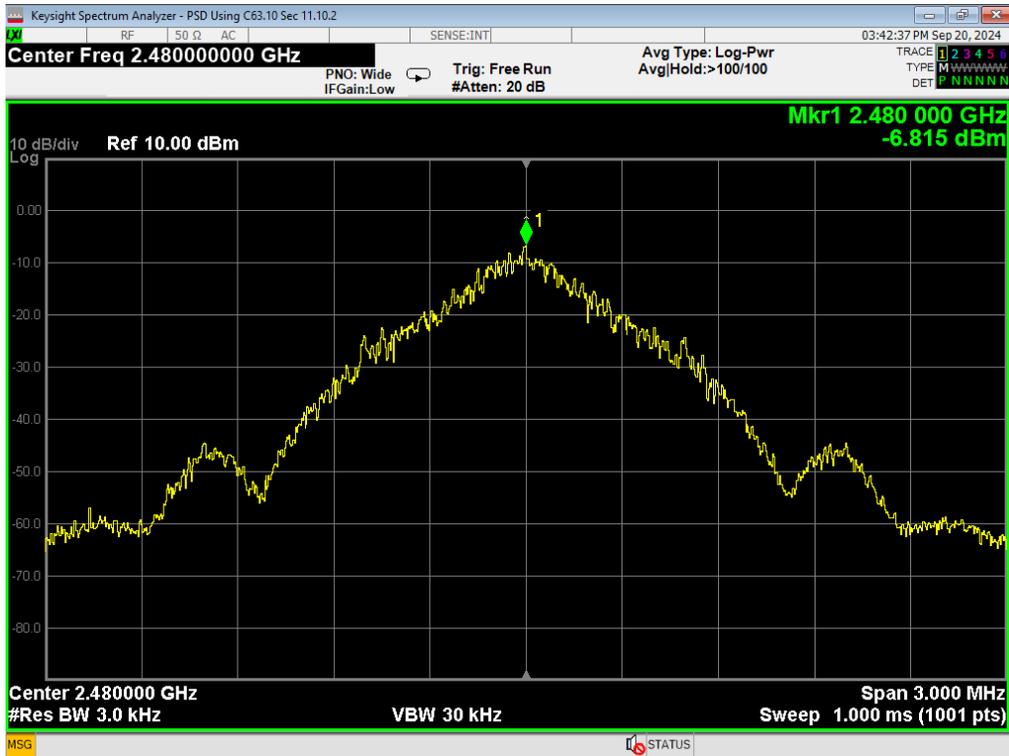
09 6dB BW, ANT GFSK, High



10 PSD, ANT GFSK, Low



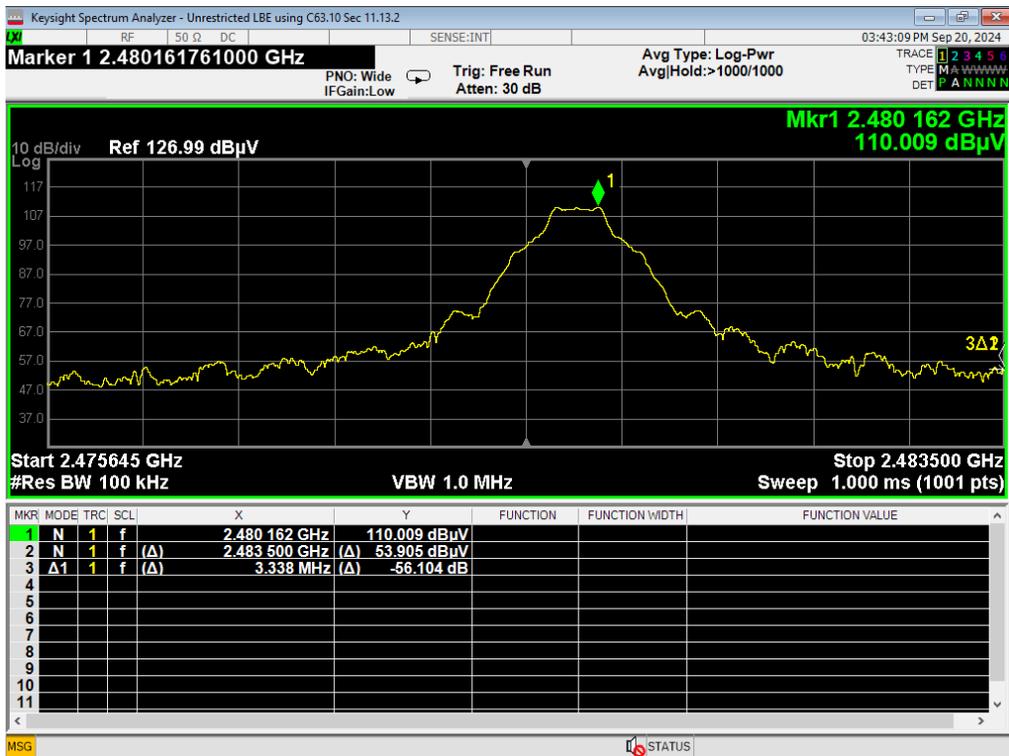
11 PSD, ANT GFSK, Mid



12 PSD, ANT GFSK, High



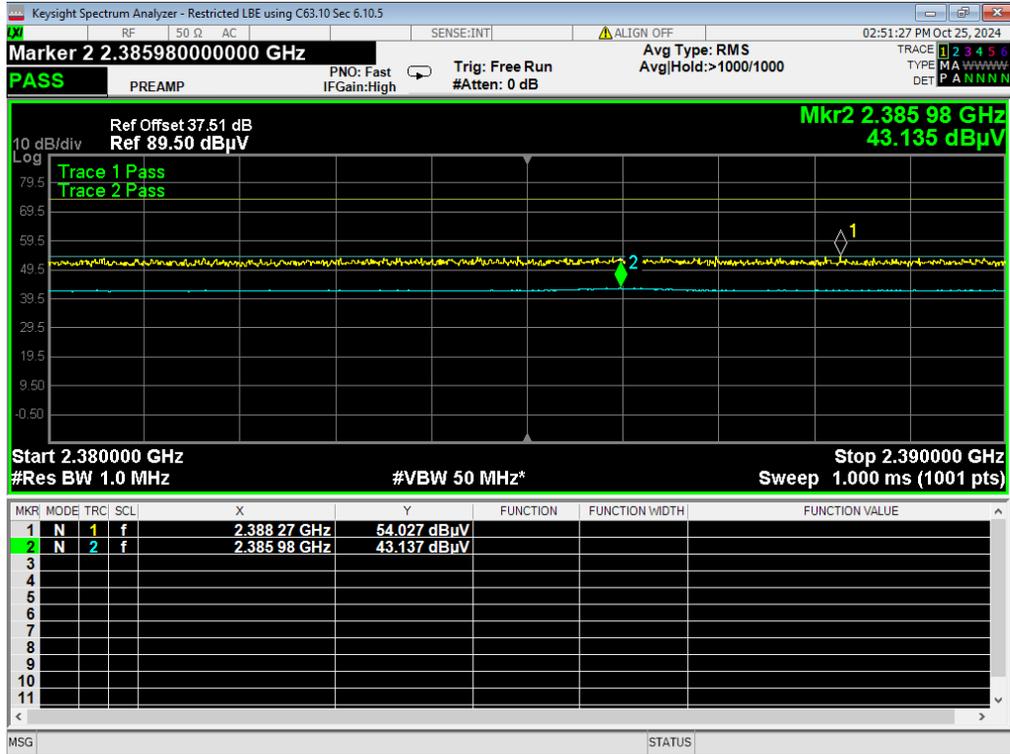
13 LBE Unrestricted, ANT GFSK



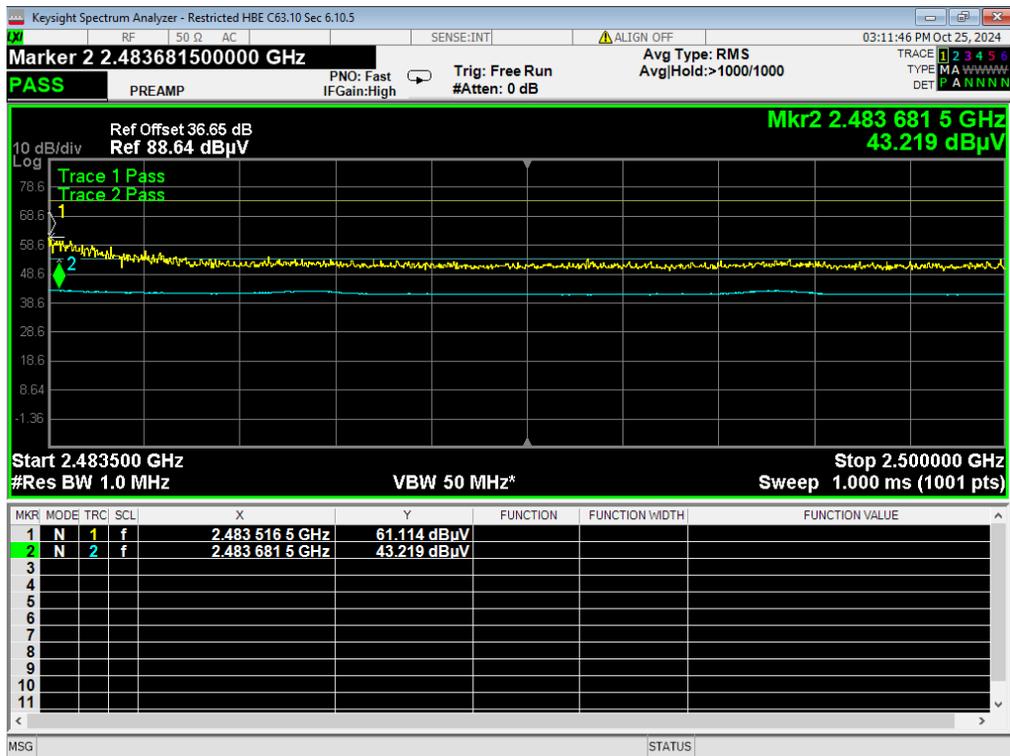
14 HBE Unrestricted, ANT GFSK



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15 LBE Restricted, ANT GFSK



16 HBE Restricted, ANT GFSK



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Prepared for:

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