

# **Exhibit C**

# **Measurement Report**

**SOVEREIGN TECHNOLOGIES**

**CORPORATION**

**FCC ID.: N8TSOV222**

**PALTRACK ATS IMTS**

***FCC Part 15 Subpart C***  
***EMI TEST REPORT***  
***of***

E.U.T. : PalTrack ATS IMTS

FCC ID. : N8TSOV222

MODEL : 11201-1197

Working Frequency : 418 MHz

***for***

APPLICANT : SOVEREIGN TECHNOLOGIES CORPORATION  
ADDRESS : 2517 HWY 35 VILLAGE #2 MANASQUAN NEW  
JERSEY, 08736

Test Performed by

**ELECTRONICS TESTING CENTER, TAIWAN**  
NO. 8 LANE 29, WENMING ROAD,  
LOSHAN TSUN, KWEISHAN HSIANG,  
TAOYUAN, TAIWAN, R.O.C.

Tel:(03)3280026-32

Fax:(03)3280034

Report Number : ET87R-10-023

## TEST REPORT CERTIFICATION

Applicant : SOVEREIGN TECHNOLOGIES CORPORATION  
2517 HWY 35 VILLAGE #2 MANASQUAN NEW JERSEY, 08736

Manufacturer : MINGTEK ELECTRONICS INC.  
8F-5, NO. 81, HSIN TAI WU RD., SEC. 1, HSI-CHIH CHENG,  
TAIPEI, TAIWAN, R.O.C.

Description of EUT :

a) Type of EUT : PalTrack ATS IMTS  
b) Trade Name : Sovereign  
c) Model No. : 11201-1197  
d) FCC ID : N8TSOV222  
e) Working Frequency : 418 MHz  
f) Power Supply : DC 3V Battery

Regulation Applied : FCC Rules and Regulations Part 15 Subpart C (1996)

I HEREBY CERTIFY THAT; The data shown in this report were made in accordance with the procedures given in ANSI C63.4 and the energy emitted by the device was founded to be within the limits applicable. I assume full responsibility for accuracy and completeness of these data.

Note : 1. The results of the testing report relate only to the items tested.  
2. The testing report shall not be reproduced except in full, without the written approval of ETC.

Issued Date : NOV. 09, 1998

Test Engineer : S. S. Liou  
(S. S. Liou)

Approve & Authorized Signer : Will Yauo  
Will Yauo, Supervisor  
EMI Test Site of ELECTRONICS  
TESTING CENTER, TAIWAN

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## 1. GENERAL INFORMATION

### 1.1 Product Description

- a) Type of EUT : PalTrack ATS IMTS (TRANSMITTER)
- b) Trade Name : Sovereign
- c) Model No. : 11201-1197
- d) FCC ID : N8TSOV222
- e) Working Frequency : 418 MHz
- f) Power Supply : DC 3V Battery

### 1.2 Characteristics of Device:

The performance of the ATS and IMTS contain the following operational criteria:

- a) Transmit Frequency: 418 MHz
- b) Transmit on periodic time intervals longer then 60 minutes
- c) Emergency transmission time: 2 minutes with 210ms pulse per second

### 1.3 Test Methodology

Both conducted and radiated testing were performed according to the procedures in chapter 13 of ANSI C63.4.

The PalTrack ATS IMTS under test was operated continuously in its normal operating mode for the purpose of the measurements. In order to secure the continuous operation of the device under test, rewiring in the circuit was done by the manufacturer so as to affect its intended operation.

The receiving antenna polarized horizontally was varied from 1 to 4 meters and the wooden turntable was rotated through 360 degrees to obtain the highest reading on the field strength meter or on the display of the spectrum analyzer. And also, each emission was to be maximized by changing the orientation of the PalTrack ATS IMTS under test.

In order to determining the average value during one pulse train of the radiated power generated from the PalTrack ATS IMTS under test, the encoded wave form in the time domain was used.

### 1.4 Test Facility

The open area test site and conducted measurement facility used to collect the radiated data is located on the roof top of Building at No.34, 5 Lin, Din Fu Tsun, Lin Kou, Taipei, Taiwan, R.O.C.

This site has been fully described in a report submitted to your office, and accepted in a letter dated Feb. 10 , 1997.

## 2. DEFINITION AND LIMITS

### 2.1 Definition

Intentional radiator:

A device that intentionally generates and emits radio frequency energy by radiation or induction.

### 2.2 Restricted Bands of Operation

Only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090 - 0.110	16.42-16.423	399.9-410	4.5-5.25
0.495 - 0.505 **	16.69475 - 16.69525	608-614	5.35-5.46
2.1735 - 2.1905	16.80425 - 16.80475	960-1240	7.25-7.75
4.125-4.128	25.5-25.67	1300-1427	8.025-8.5
4.17725-4.17775	37.5-38.25	1435-1626.5	9.0-9.2
4.20725-4.20775	73-74.6	1645.5-1646.5	9.3-9.5
6.215-6.218	74.8-75.2	1660-1710	10.6-12.7
6.26775-6.26825	108-121.94	1718.8-1722.2	13.25-13.4
6.31175-6.31225	123-138	2200-2300	14.47-14.5
8.291-8.294	149.9-150.05	2310-2390	15.35-16.2
8.362-8.366	156.52475 - 156.52525	2483.5-2500	17.7-21.4
8.37625-8.38675	156.7-156.9	2655-2900	22.01-23.12
8.41425-8.41475	162.0125-167.17	3260-3267	23.6-24.0
12.29-12.293	167.72-173.2	3332-3339	31.2-31.8
12.51975-12.52025	240-285	3345.8-3358	36.43-36.5
12.57675-12.57725	322-335.4	3360-4400	Above 38.6
13.36-13.41			

Remark "\*\*\*" : Until February 1, 1999, this restricted band shall be 0.490-0.510 MHz

### 2.3 Limitation

#### (1) Conducted Emission Limits :

For an intentional radiator which is designed to be connected to the public utility (AC) power line, the conducted limit is the following:

Frequency ( MHz )	Emission ( $\mu$ V )	Emission ( dB $\mu$ V )
0.45 - 30.0	250	48.0

**(2) Radiated Emission Limits :**

According to 15.231 ,Periodic operation in the band 40.66-40.70 MHz and above 70 MHz, the field strength of emissions from intentional radiators operated under this section shall not exceed the following:

Frequency Band (MHz)	Field strength of Fundamental (uV/m)	Field strength of Spurious (uV/m)
40.66-40.70	2250	225
70-130	1250	125
130-174	*1,250 to 3,750	*125 to 375
174-260	3750	375
260-470	*3,750 to 12,500	*375 to 1250
Above 470	12500	1250

\* Linear interpolations.

According to 15.235, the field strength of emissions from intentional radiators operated under these frequency bands shall not exceed the following:

Fundamental Frequency (MHz)	Field Strength of Fundamental	
	$\mu\text{V}/\text{meter}$	$\text{dB}\mu\text{V}/\text{meter}$
49.82 - 49.90	10000	80

Field strength limits are at the distance of 3 meters, emissions radiated outside of the specified bands, shall be according to the general radiated limits in 15.209,as following table:

Other Frequencies (MHz)	Field Strength of Fundamental	
	$\mu\text{V}/\text{meter}$	$\text{dB}\mu\text{V}/\text{meter}$
30 - 88	100	40.0
88 - 216	150	43.5
216 - 960	200	46.0
Above 960	500	54.0

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, specified above by more than 20 dB under any condition of modulation.

**(3) Limit of transmission time**

- a) A manually operated PalTrack ATS IMTS shall employ a switch that will automatically deactivate the PalTrack ATS IMTS within not more than 5 seconds of being released.
- b) A PalTrack ATS IMTS activated automatically shall cease transmission within 5 seconds after activation.

**2.4 Labeling Requirement**

The device shall bear the following statement in a conspicuous location on the device :

This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

**2.5 User Information**

The users manual or instruction manual for an intentional or unintentional radiator shall caution the user that changes or modifications not expressly approved by the party responsible for compliance could void the user's authority to operate the equipment.



### 3. RADIATED EMISSION MEASUREMENT

#### 3.1 Applicable Standard

For periodic operation intentional radiator, the radiated emission shall comply with § 15.231(b).

#### 3.2 Measurement Procedure

1. Setup the configuration per figure 1 and 2 for frequencies measured below and above 1 GHz respectively. Turn on EUT and make sure that it is in normal function.
2. For emission frequencies measured below 1 GHz, a pre-scan is performed in a shielded chamber to determine the accurate frequencies of higher emissions will be checked on a open test site. As the same purpose, for emission frequencies measured above 1 GHz, a pre-scan also be performed with a 1 meter measuring distance before final test.
3. For emission frequencies measured below and above 1 GHz, set the spectrum analyzer on a 100 kHz and 1 MHz resolution bandwidth respectively for each frequency measured in step 2.
4. The search antenna is to be raised and lowered over a range from 1 to 4 meters in horizontally polarized orientation. Position the highness when the highest value is indicated on spectrum analyzer, then change the orientation of EUT on test table over a range from 0 ° to 360 ° with a speed as slow as possible, and keep the azimuth that highest emission is indicated on the spectrum analyzer. Vary the antenna position again and record the highest value as a final reading. A RF test receiver is also used to confirm emissions measured.
5. Repeat step 4 until all frequencies need to be measured were complete.
6. Repeat step 5 with search antenna in vertical polarized orientations.
7. Check the three frequencies of highest emission with varying the placement of cables (if any) associated with EUT to obtain the worse case and record the result.

Figure 1 : Frequencies measured below 1 GHz configuration

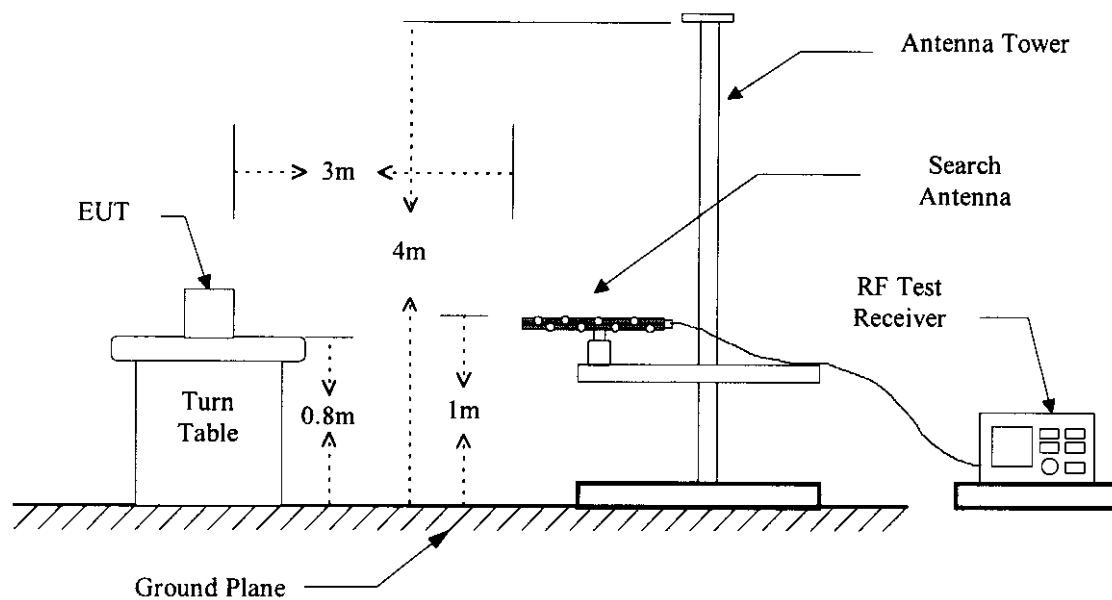
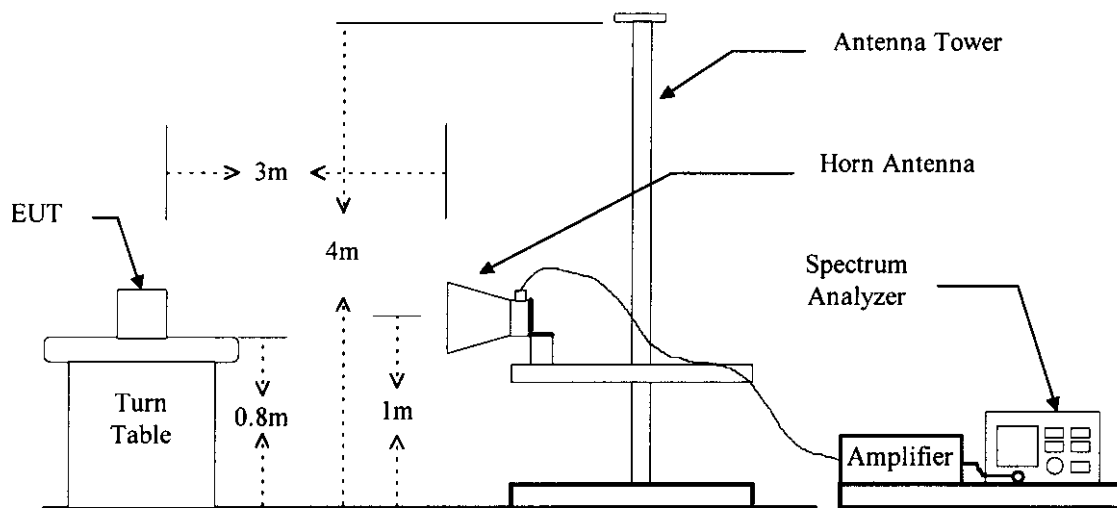


Figure 2 : Frequencies measured above 1 GHz configuration



**3.3 Test Data****A. ATS**

Temperature : 26 °C  
 Humidity : 60 %  
 Operated mode : Transmitting  
 Test Date : OCT. 13, 1998

Frequency (MHz)	Ant Pol H/V	Reading (dBuV) Peak	Factor (dB)		Result @3m (dBuV/m)		Limit @3m (dBuV/m)		Margin (dB)	Table Degree (Deg.)	Ant. High (m)
			C	D	Peak	Ave.	Peak	Ave.			
418.092	V	80.4	-5.7	-4.3	74.7	70.4	100.3	80.3	-9.9	0	1.00
836.142	V	50.9	1.8	-4.3	52.7	48.4	80.3	60.3	-11.9	90	1.50
1254.085	V	42.2	-8.6	-4.3	33.6	29.3	80.3	60.3	-31.0	0	1.30
1672.113	V	42.0	-6.5	-4.3	35.5	39.8	80.3	60.3	-20.5	0	1.30
2090.460	H/V	---	-4.3	-4.3	---	---	80.3	60.3	---	---	---
2508.552	H/V	---	-2.7	-4.3	---	---	80.3	60.3	---	---	---
2926.644	H/V	---	-1.4	-4.3	---	---	80.3	60.3	---	---	---
3344.736	H/V	---	-0.4	-4.3	---	---	80.3	60.3	---	---	---
3762.828	H/V	---	1.1	-4.3	---	---	80.3	60.3	---	---	---
4180.920	H/V	---	2.0	-4.3	---	---	80.3	60.3	---	---	---

**Note :**

1. Factor C means "corrected", and that includes antenna factor, cable loss, amplifier gain (if any). And Factor D means "Duty", that is for calculating the average value and derived from section 3.6 in this test report.
2. Result = Reading + C. Factor  
Ave. = Peak Value + D Factor
3. "\*" means the frequency fall in the restricted frequency band, and the limit of emission is referred to FCC class B
4. The limit for spurious emissions refers to FCC §15.231.

If the measured frequencies fall in the restricted frequency band, the limit employed is § 15.209 general requirement when frequencies are below or equal to 1 GHz. And the measuring instrument is set to quasi peak detector function, no duty factor applied.

**B. IMTS**

Temperature : 26 °C  
 Humidity : 60 %  
 Operated mode : Transmitting  
 Test Date : OCT. 13, 1998

Frequency (MHz)	Ant Pol H/V	Reading (dBuV) Peak	Factor (dB)		Result @3m (dBuV/m)		Limit @3m (dBuV/m)		Margin (dB)	Table Degree (Deg.)	Ant. High (m)
			C	D	Peak	Ave.	Peak	Ave.			
418.092	H	81.2	-5.7	-4.3	75.5	71.2	100.3	80.3	-9.1	90	1.20
836.142	V	55.7	1.8	-4.3	57.5	53.2	80.3	60.3	-7.1	0	1.00
1254.223	V	58.3	-8.6	-4.3	49.7	45.4	80.3	60.3	-14.9	90	1.00
1672.289	V	46.9	-6.5	-4.3	40.4	36.1	80.3	60.3	-24.2	90	1.00
2090.366	V	34.6	-4.3	-4.3	30.3	26.0	80.3	60.3	-34.3	0	1.00
2508.442	V	30.3	-2.7	-4.3	27.6	23.3	80.3	60.3	-37.0	0	1.00
2926.514	V	27.7	-1.4	-4.3	26.3	22.0	80.3	60.3	-38.3	0	1.00
3344.736	H/V	---	-0.4	-4.3	---	---	80.3	60.3	---	---	---
3762.828	H/V	---	1.1	-4.3	---	---	80.3	60.3	---	---	---
4180.920	H/V	---	2.0	-4.3	---	---	80.3	60.3	---	---	---

**Note :**

1. Factor C means "corrected", and that includes antenna factor, cable loss, amplifier gain (if any). And Factor D means "Duty", that is for calculating the average value and derived from section 3.6 in this test report.
2. Result = Reading + C. Factor  
Ave. = Peak Value + D Factor
3. "\*" means the frequency fall in the restricted frequency band, and the limit of emission is referred to FCC class B
4. The limit for spurious emissions refers to FCC §15.231.

If the measured frequencies fall in the restricted frequency band, the limit employed is § 15.209 general requirement when frequencies are below or equal to 1 GHz. And the measuring instrument is set to quasi peak detector function, no duty factor applied.

### 3.4 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. For the limit is employed average value, therefore the peak value can be transferred to average value by subtracting the duty factor. The basic equation with a sample calculation is as follows:

$$\text{Peak} = \text{Reading} + \text{Corrected Factor}$$

where

Corr. Factor = Antenna Factor + Cable Factor - Amplifier Gain (if any)

And the average value is

$$\text{Average} = \text{Peak Value} + \text{Duty Factor}$$

*Note : If the measured frequencies are fall in the restricted frequency band, the limit employed must be quasi peak value when frequencies are below or equal to 1 GHz. And the measuring instrument is set to quasi peak detector function.*

### 3.5 Activate Time

According to §15.231(a)(3) and (4), polling or supervision transmissions to determine system integrity of transmitters used in security or safety applications are allowed if the periodic rate of transmission does not exceed one transmission of not more than one second duration per hour for each transmitter. Intentional radiators which are employed for radio control purposes during emergencies involving fire, security, and safety of life, when activated to signal an alarm, may operate during the pendency of the alarm condition. About the EUT, PalTrack ATS IMTS, the timed interval transmits occur over 60 minutes and each transmit have a RF output duration of approximately 210ms. Under emergency condition the transmitter will transmit for approximately 2 minutes.

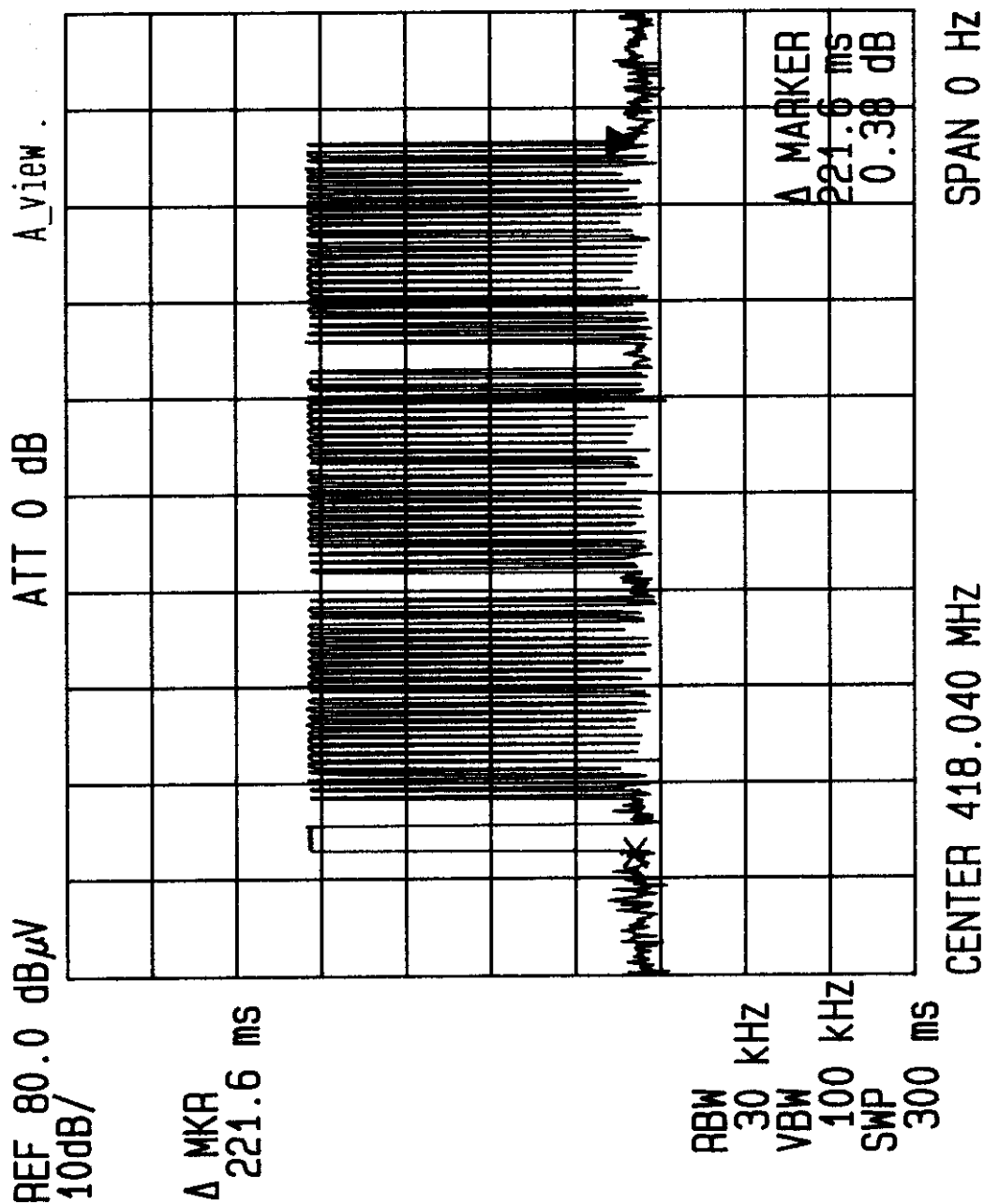
### 3.6 Calculation of Duty Factor

The total period of pulse train is 52.8 ms, and the total duty is 15.288 ms, and the duty factor is calculated with following formula :

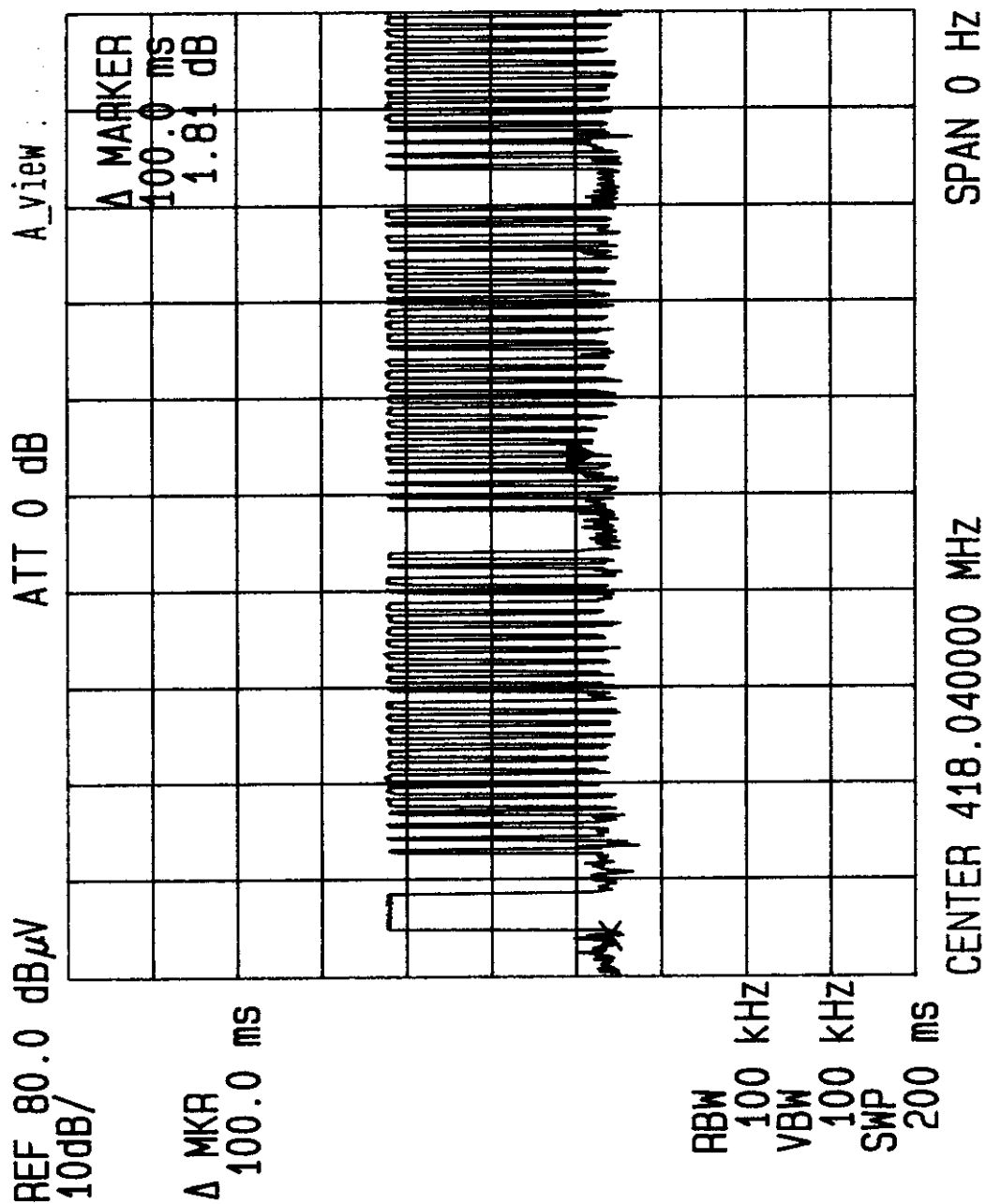
$$20\log\left|\frac{7.857\text{ms} + (19 \times 2.143\text{ms}) + (11 \times 1.143\text{ms})}{41.79\text{ms}}\right| = -4.3 \text{ (dB)}$$

Details please see following two plotted pages.

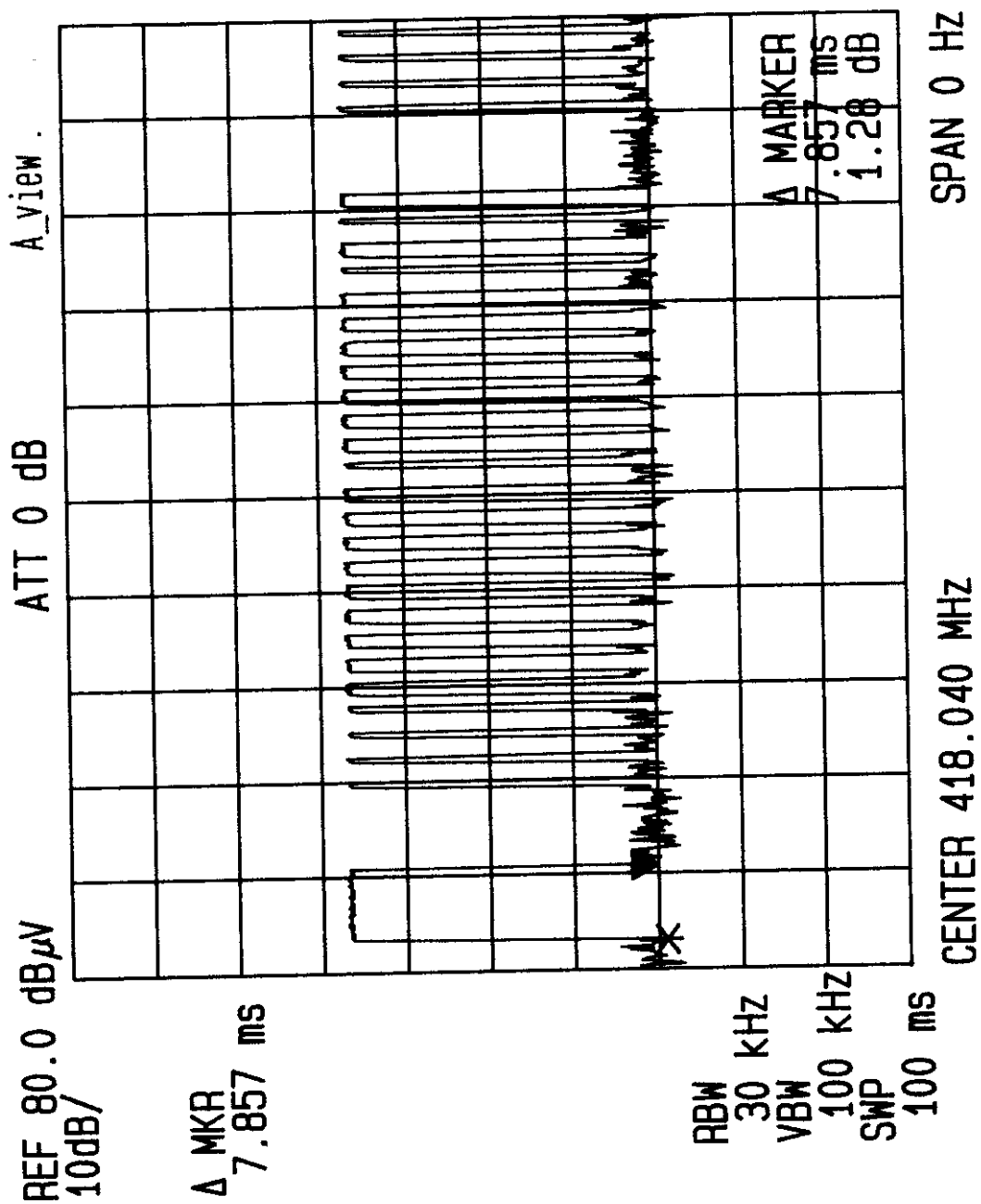
a. Full Cycle of The Pulse Train



## b. Detail of The Pulse Train

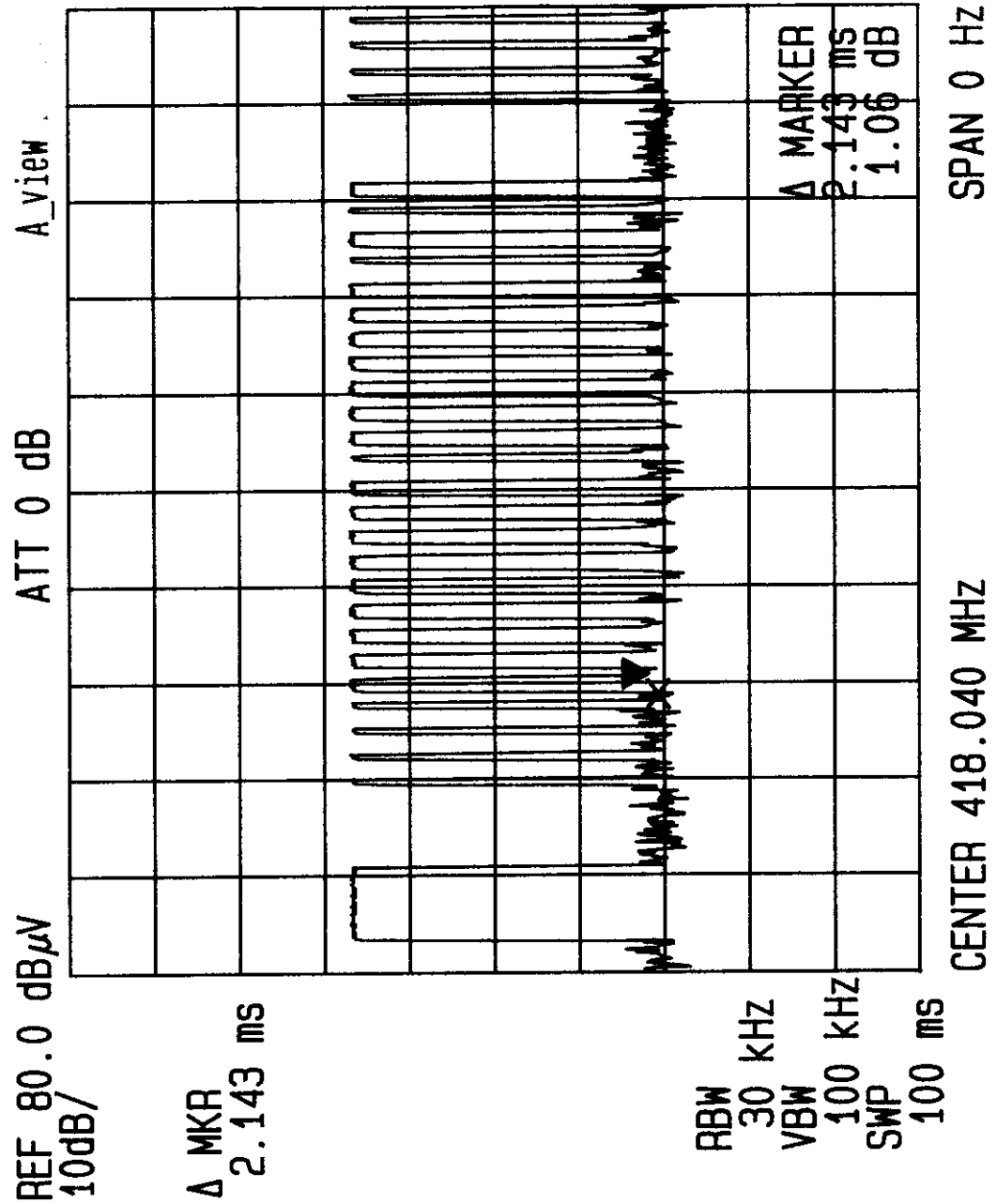


c. Detail of The Pulse Train

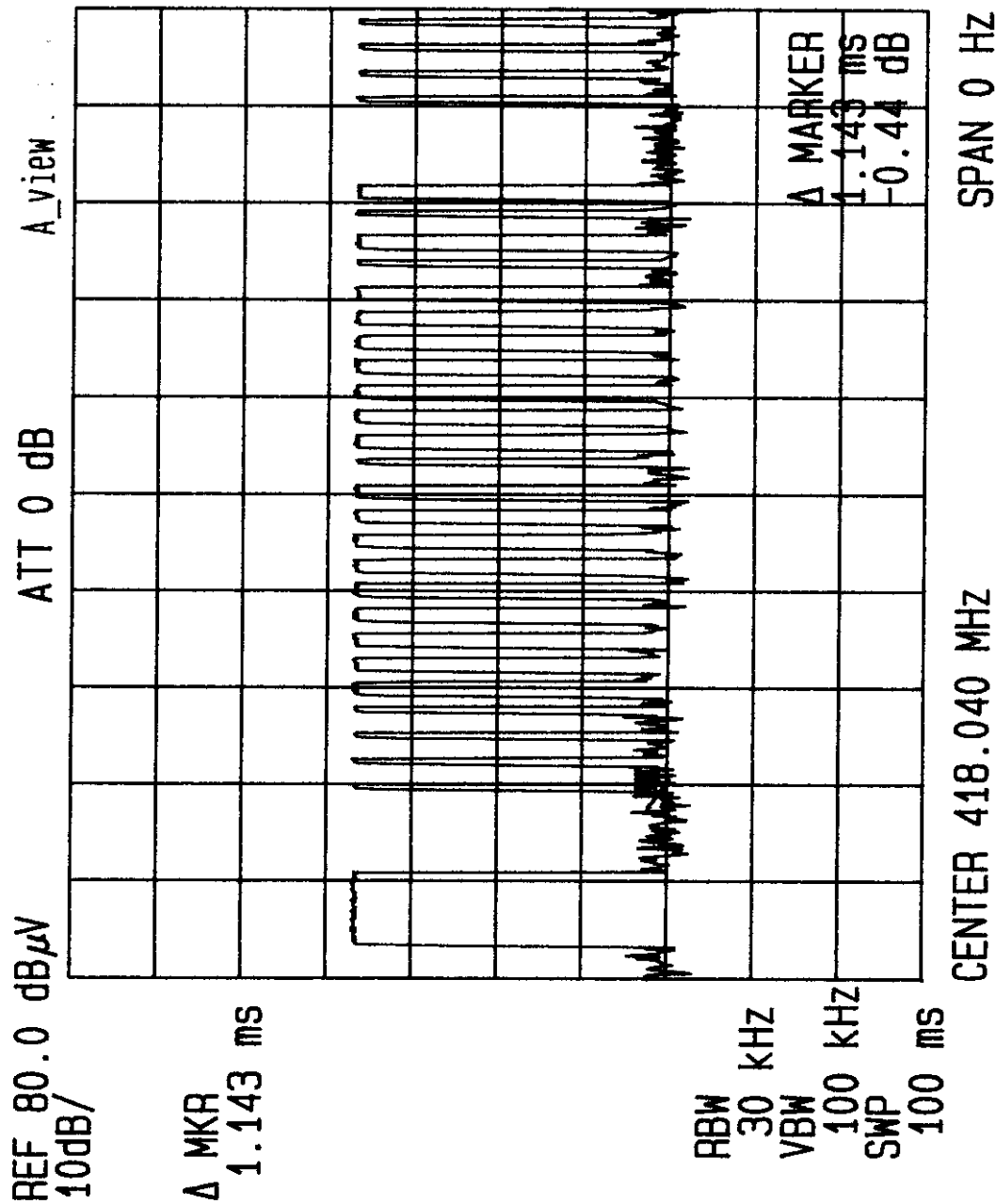




d. Detail of The Pulse Train



e. Detail of The Pulse Train



**3.7 Radiated Test Equipment**

Equipment	Manufacturer	Model No.	Next Cal. Date
Spectrum Analyzer	Hewlett-Packard	8568B	10/16/1999
Pre-selector	Hewlett-Packard	85685A	10/16/1999
Quasi Peak Detector	Hewlett-Packard	85650A	10/07/1999
Spectrum Analyzer	Adventest	R3271	08/24/1999
RF Test Receiver	Rohde & Schwarz	ESVS 30	12/10/1998
Horn Antenna	EMCO	3115	08/05/1999
Log periodic Antenna	EMCO	3146	08/05/1999
Biconical Antenna	EMCO	3110	08/05/1999
Preamplifier	Hewlett-Packard	8449B	06/18/1999
Preamplifier	Hewlett-Packard	8447D	12/23/1998

**3.8 Measuring Instrument Setup**

Explanation of measuring instrument setup in frequency band measured is as following :

Frequency Band (MHz)	Instrument	Function	Resolution bandwidth	Video Bandwidth
30 to 1000	RF Test Receiver	Quasi Peak	120 kHz	N/A
	Spectrum Analyzer	Peak	100 kHz	100 kHz
Above 1000	Spectrum Analyzer	Peak	1 MHz	1 MHz

## 4. BANDWIDTH OF EMISSION

### 4.1 Applicable Standard Plot Graphic of Bandwidth

Per FCC rule § 15.231(c), the permitted emission bandwidth is no wider than 0.25% of the center frequency for devices operating above 70 MHz and below 900 MHz.

### 4.2 Bandwidth Test Equipment

Equipment	Manufacturer	Model No.	Next Cal. Date
Spectrum Analyzer	Adventest	R3271	08/24/1999
Plotter	Hewlett-Packard	7550A	N/A

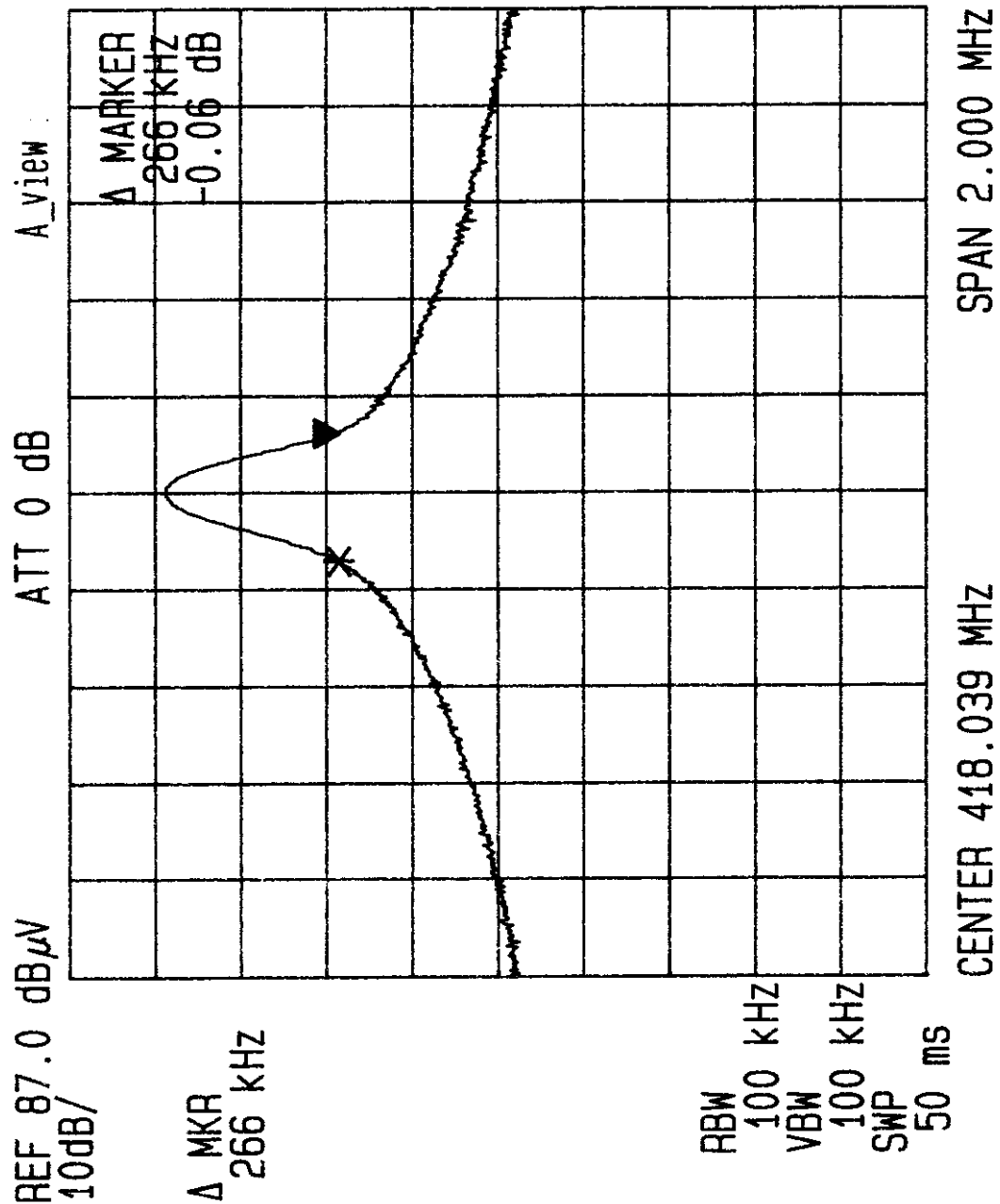
### 4.3 Plot Graphic of Bandwidth

Plotted graphics please see following page.

#### 4.4 Emission Bandwidth

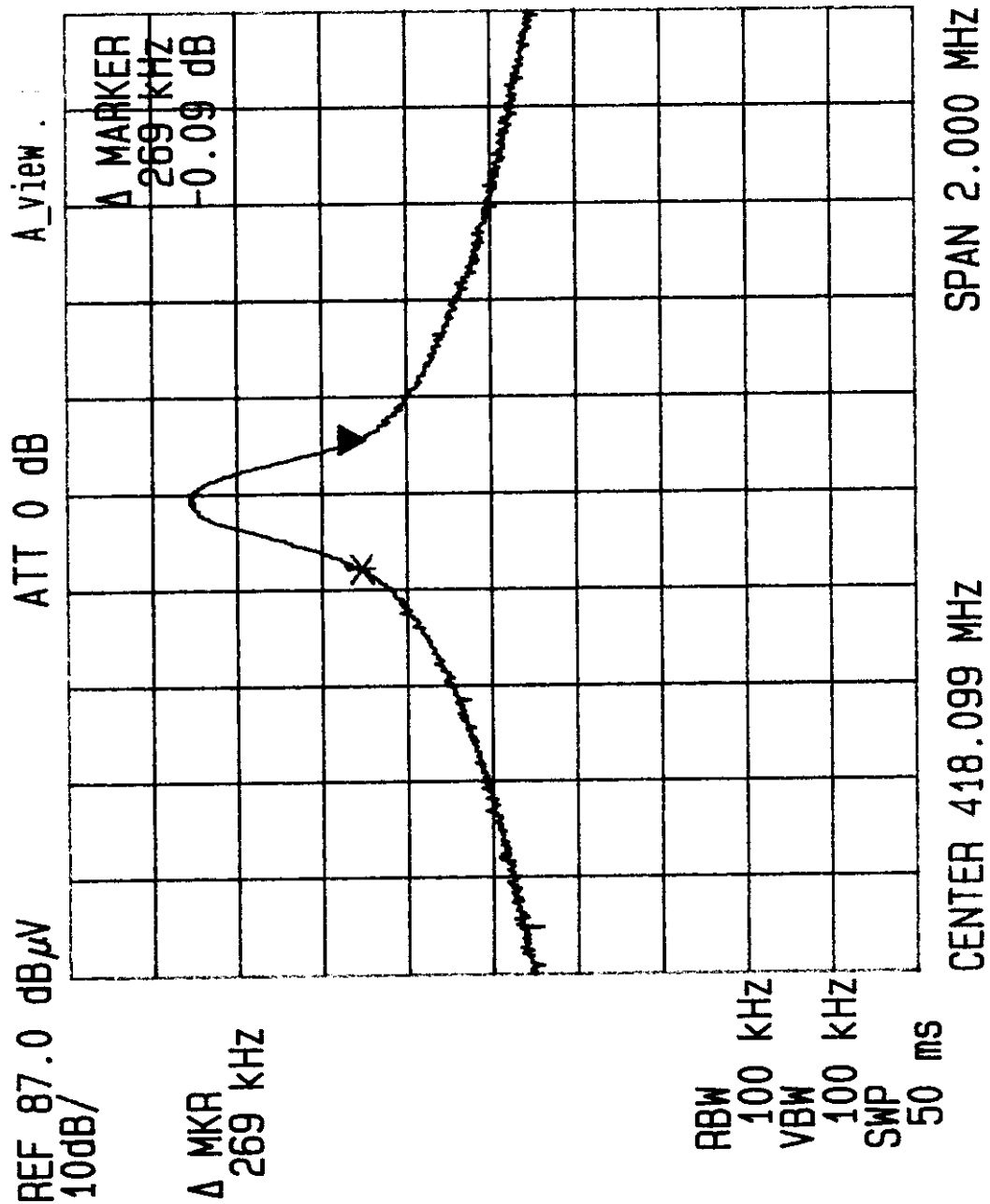
##### A. ATS

The emission bandwidth for this transmitter is  
 $266\text{kHz} < 418\text{MHz} \times 0.25\% = 1045\text{ kHz}$



**B. IMTS**

The emission bandwidth for this transmitter is  
 $269\text{kHz} < 418\text{MHz} \times 0.25\% = 1045\text{ kHz}$



## **5. CONDUCTED EMISSION MEASUREMENT**

### **5.1 Standard Applicable**

This EUT is excused from investigation of conducted emission, for it is powered by battery only. According to § 15.207 (d), measurements to demonstrate compliance with the conducted limits are not required for devices which only employ battery power for operation and which do not operate from the AC power lines or contain provisions for operation while connected to the AC power lines.