Senton Enterprises Limited

Application
For
Permissive Change

900MHz 40 Channel Analog Modulation Cordless Phone with Alarm Clock Radio

(FCC ID: PEG39281-5)

WO# 0210549
TL/Ann Choy
October 8, 2002

- The test results reported in this report shall refer only to the sample actually tested and shall not refer or be deemed to refer to bulk from which such a sample may be said to have been obtained.
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FCC ID: PEG39281-5

Intertek Testing Services Hong Kong Ltd.
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LIST OF EXHIBITS

INTRODUCTION

EXHIBIT 1: General Description

EXHIBIT 2: System Test Configuration

EXHIBIT 3: Emission Results

EXHIBIT 4: Equipment Photographs

EXHIBIT 5: Product Labelling

EXHIBIT 6: Technical Specifications

EXHIBIT 7: Instruction Manual

EXHIBIT 8: Security Code Information

MEASUREMENT/TECHNICAL REPORT

Senton Enterprises Limited - MODEL: 39281
FCC ID: PEG39281-5

This report concerns (check one:) Original Grant _____ Class II Change _X___

Equipment Type : Cordless Telephone (example : computer, modem, transmitter, etc.)

Deferred grant requested per 47 CFR 0.457(d)(1)(ii)? Yes _____ No _X___

If yes, defer until : _____
date

Company Name agrees to notify the Commission by: _____
date

of the intended date of announcement of the product so that the grant can be issued on that date.

Transition Rules Request per 15.37 ? Yes _____ No _X___

If no, assumed Part 15, Subpart C for intentional radiator - the new 47 CFR [12-18-01 Edition] Provision.

Report prepared by:

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Table of Contents

1.0 **General Description** 2
1.1 Product Description 2
1.2 Purpose of Application 2
1.3 Test Methodology 3
1.4 Test Facility 3

2.0 **System Test Configuration** 5
2.1 Justification 5
2.2 EUT Exercising Software 5
2.3 Support Equipment List and Description 6
2.4 Measurement Uncertainty 7
2.5 Equipment Modification 7

3.0 **Emission Results** 9
3.1 Field Strength Calculation 10
3.2 Radiated Emission Configuration Photograph - Base Unit 11
3.3 Radiated Emission Data - Base Unit 12
3.4 Radiated Emission Configuration Photograph - Handset 15
3.5 Radiated Emission Data - Handset 16
3.6 Radiated Emission on the bandedge 19
3.7 Line Conducted Configuration Photograph - Base Unit 21
3.8 Line Conducted Emission Data - Base Unit 22

4.0 **Equipment Photographs** 25

5.0 **Product Labelling** 27

6.0 **Technical Specifications** 29

7.0 **Instruction Manual** 31

8.0 **Security Code Information** 33

List of attached file

Exhibit type	File Description	filename
Test Report	Test Report	report.doc
Operation Description	Technical Description	descri.pdf
Cover Page	Purpose of Application	product change.pdf
Test Setup Photo	Radiated Emission for Base	config photos.doc
Test Setup Photo	Radiated Emission for Handset	config photos.doc
Test Report	Emission Plot	emission.pdf
Test Setup Photo	Conducted Emission	config photos.doc
Test Report	Conducted Emission Test Result	conduct.pdf
External Photo	External Photo	external photos.doc
Internal Photo	Internal Photo	internal photos.doc
Block Diagram	Block Diagram	block.pdf
Schematics	Circuit Diagram	circuit.pdf
ID Label/Location	Label Artwork and Location	label.pdf
User Manual	User Manual	manual.pdf
User Manual	FCC Information	fcc information.pdf

EXHIBIT 1
GENERAL DESCRIPTION

1.0 General Description

1.1 Product Description

The 39281 is a 900MHz 40 Channel Analog Modulation Cordless Phone with Alarm Clock Radio. The unit is capable of either tone or pulse dialing. The internal power supply's isolation is accomplished through a power transformer having an adequate dielectric rating. The circuit wiring is consistent under the requirement of part 68.

The handset unit consists of a keypad with twelve standard keys (0,...9,*,#), six function keys (Memo, Flash, Redial, Mute, Pause, Volume), and one channel switch key. A Talk key is provided to control pick/release telephone line in a toggle base.

The base unit has a page key, which is used to page the handset unit.

The antennas used in base unit and handset are integral, and the tested sample is a prototype.

The circuit description is saved with filename: descri.pdf

Connection between the device and the telephone network is accomplished through the use of USOC RJ11C in the 2-wire loop calling central office line.

1.2 Purpose of Application

The purpose of application is saved with filename: product change.pdf.

1.3 Test Methodology

Both AC mains line-conducted and radiated emission measurements were performed according to the procedures in ANSI C63.4 (1992). All measurements were performed in Open Area Test Sites. Preliminary scans were performed in the Open Area Test Sites only to determine worst case modes. All Radiated tests were performed at an antenna to EUT distance of 3 meters, unless stated otherwise in the "**Justification Section**" of this Application.

1.4 Test Facility

The open area test site and conducted measurement facility used to collect the radiated data is located at Garment Centre, 576 Castle Peak Road, Kowloon, Hong Kong. This test facility and site measurement data have been fully placed on file with the FCC.

EXHIBIT 2
SYSTEM TEST CONFIGURATION

2.0 System Test Configuration

2.1 Justification

For emission testing, the equipment under test (EUT) was configured for testing in a typical fashion (as a customer would normally use it). During testing, all cables were manipulated to produce worst case emissions. The handset was powered by a fully charged battery.

For the measurements, the EUT is attached to a cardboard box if necessary and placed on the wooden turntable. If the base unit attaches to peripherals, they are connected and operational (as typical as possible). The handset is remotely located as far from the antenna and the base as possible to ensure full power transmission from the base. Else, the base is wired to transmit full power without modulation.

The signal is maximized through rotation and placement in the three orthogonal axes. The antenna height and polarization are varied during the search for maximum signal level. The antenna height is varied from 1 to 4 meters. Detector function is in peak mode. Radiated emissions are taken at three meters unless the signal level is too low for measurement at that distance. If necessary, a pre-amplifier is used and/or the test is conducted at a closer distance.

All readings are extrapolated back to the equivalent three meter reading using inverse scaling with distance. Analyzer resolution is 100 kHz or greater. The spurious emissions more than 20 dB below the permissible value are not reported.

2.2 EUT Exercising Software

The EUT exercise program used during radiated and conducted testing was designed to exercise the various system components in a manner similar to a typical use.

For emissions testing, the units were setup to transmit continuously to simplify the measurement methodology. Care was taken to ensure proper power supply voltages during testing.

2.3 Support Equipment List and Description

The FCC ID's for all equipment, plus descriptions of all cables used in the tested system (included inserted cards, which have grants) are:

HARDWARE:

The unit was operated standalone. An AC adapter (provided with the unit) was used to power the device. Its description is listed below.

(1) AC adapter with two meter unshielded power cord permanently affixed.

CABLES:

(1) Telecommunication cable with RJ11C connectors (1m, unshielded), terminated

OTHERS:

(1) A headset for telephone use with 1.2m unshielded cable permanently affixed. (Supplied by ITS)

2.4 Measurement Uncertainty

When determining of the test conclusion, the Measurement Uncertainty of test has been considered.

2.5 Equipment Modification

Any modifications installed previous to testing by Senton Enterprises Limited will be incorporated in each production model sold/leased in the United States.

No modifications were installed by ETL Division, Intertek Testing Services Hong Kong Ltd.

All the items listed under section 2.0 of this report are confirmed by:

Confirmed by:

Tommy Leung
Assistant Supervisor
Intertek Testing Services
Agent for Senton Enterprises Limited

_____Signature

October 8, 2002 _____Date

EXHIBIT 3
EMISSION RESULTS

3.0 Emission Results

Data is included of the worst case configuration (the configuration which resulted in the highest emission levels). A sample calculation, configuration photographs and data tables of the emissions are included.

3.1 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

where FS = Field Strength in dBμV/m
RA = Receiver Amplitude (including preamplifier) in dBμV
CF = Cable Attenuation Factor in dB
AF = Antenna Factor in dB
AG = Amplifier Gain in dB

In the following table(s), the reading shown on the data table reflects the preamplifier gain. An example for the calculations in the following table is as follows:-

FS = RR + LF

where FS = Field Strength in dBμV/m
RR = RA - AG in dBμV
LF = CF + AF in dB

Assume a receiver reading of 52.0 dBμV is obtained. The antenna factor of 7.4 dB and cable factor of 1.6 dB is added. The amplifier gain of 29 dB is subtracted, giving a field strength of 32 dBμV/m. This value in dBμV/m was converted to its corresponding level in μV/m.

RA = 52.0 dBμV/m
AF = 7.4 dB
CF = 1.6 dB
AG = 29.0 dB
FS = RR + LF
FS = 23 + 9 = 32 dBμV/m

RR = 23.0 dBμV
LF = 9.0 dB

Level in μV/m = Common Antilogarithm [(32 dBμV/m)/20] = 39.8 μV/m

3.2 Radiated Emission Configuration Photograph - Base Unit

Worst Case Radiated Emission

at 452.275 MHz

For electronic filing, the worst case radiated emission configuration photographs are saved with filename: config photos.doc

3.3 Radiated Emission Data - Base Unit

The data on the following pages list the significant emission frequencies, the limit and the margin of compliance.

Judgement : Passed by 6.8 dB

****

TEST PERSONNEL:

Tester Signature

Jess Tang, Engineer
Typed/Printed Name

October 4, 2002
Date

Company: Senton Enterprises Limited
Model: 39281
Mode : TX-Channel 1

Date of Test: August 18, 2002

Table 1, Base unit

Radiated Emissions

Polarity	Frequency (MHz)	Reading (dBμV)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Net at 3m (dBμV/m)	Limit (dBμV/m)	Margin (dB)
H	902.600	71.4	22.6	16	78.0	94	-16.0
H	451.300	37.2	16.8	16	38.0	46	-8.0
V	1805.200	42.2	26.5	34	34.7	54	-19.3

NOTES:

1. Quasi-peak detector is used for the emission below or equal to 1000 MHz.
2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
3. Negative value in the margin column shows emission below limit.
4. Horn antenna and average detector are used for the emission over 1000MHz.
5. Radiated emission measurement were performed the lowest radio frequency signal generated in the device which is greater than 9kHz to 10GHz.

* Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak detector data for frequencies below 1000 MHz and average detector data for frequencies over 1000 MHz.

Test Engineer: Jess Tang

Company: Senton Enterprises Limited
Model: 39281
Mode : TX-Channel 40

Date of Test: August 18, 2002

Table 2, Base unit

Radiated Emissions

Polarity	Frequency (MHz)	Reading (dBμV)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Net at 3m (dBμV/m)	Limit (dBμV/m)	Margin (dB)
H	904.550	72.2	22.6	16	78.8	94	-15.2
H	452.275	38.4	16.8	16	39.2	46	-6.8
V	1809.100	42.2	26.5	34	34.7	54	-19.3

NOTES:

1. Quasi-peak detector is used for the emission below or equal to 1000 MHz.
2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
3. Negative value in the margin column shows emission below limit.
4. Horn antenna and average detector are used for the emission over 1000MHz.
5. Radiated emission measurement were performed the lowest radio frequency signal generated in the device which is greater than 9kHz to 10GHz.

* Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak detector data for frequencies below 1000 MHz and average detector data for frequencies over 1000 MHz.

Test Engineer: Jess Tang

3.4 Radiated Emission Configuration Photograph - Handset

Worst Case Radiated Emission

at 463.825 MHz

For electronic filing, the worst case radiated emission configuration photographs are saved with filename: config photos.doc

3.5 Radiated Emission Data - Handset

The data on the following pages list the significant emission frequencies, the limit and the margin of compliance.

Judgement : Passed by 3.6 dB

****

TEST PERSONNEL:

Tester Signature

Jess Tang, Engineer
Typed/Printed Name

October 4, 2002
Date

Company: Senton Enterprises Limited
Model: 39281
Mode : TX-Channel 1

Date of Test: August 18, 2002

Table 3, Handset

Radiated Emissions

Polarity	Frequency (MHz)	Reading (dBμV)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Net at 3m (dBμV/m)	Limit (dBμV/m)	Margin (dB)
V	925.700	78.3	22.8	16	85.1	94	-8.9
V	462.850	41.2	16.8	16	42.0	46	-4.0
V	*1388.550	46.3	25.5	34	37.8	54	-16.2
H	1851.400	44.7	26.5	34	37.2	54	-16.8
H	*2314.250	42.9	29.1	34	38.0	54	-16.0
H	*2777.100	42.8	29.1	34	37.9	54	-16.1

NOTES:

1. Quasi-peak detector is used for the emission below or equal to 1000 MHz.

2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.

3. Negative value in the margin column shows emission below limit.

4. Horn antenna and average detector are used for the emission over 1000MHz.

5. Radiated emission measurement were performed the lowest radio frequency signal generated in the device which is greater than 9kHz to 10GHz.

* Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak detector data for frequencies below 1000 MHz and average detector data for frequencies over 1000 MHz.

Test Engineer: Jess Tang

Company: Senton Enterprises Limited
Model: 39281
Mode : TX-Channel 40

Date of Test: August 18, 2002

Table 4, Handset

Radiated Emissions

Polarity	Frequency (MHz)	Reading (dBμV)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Net at 3m (dBμV/m)	Limit (dBμV/m)	Margin (dB)
V	927.650	78.2	22.8	16	85.0	94	-9.0
V	463.825	41.6	16.8	16	42.4	46	-3.6
V	*1391.475	46.4	25.5	34	37.9	54	-16.1
H	1855.300	44.7	26.5	34	37.2	54	-16.8
H	*2319.125	42.9	29.1	34	38.0	54	-16.0
H	*2782.950	43.0	29.1	34	38.1	54	-15.9

NOTES:

1. Quasi-peak detector is used for the emission below or equal to 1000 MHz.
2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
3. Negative value in the margin column shows emission below limit.
4. Horn antenna and average detector are used for the emission over 1000MHz.
5. Radiated emission measurement were performed the lowest radio frequency signal generated in the device which is greater than 9kHz to 10GHz.

* Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak detector data for frequencies below 1000 MHz and average detector data for frequencies over 1000 MHz.

Test Engineer: Jess Tang

3.6 Radiated Emission on the bandedge

From the following plots, they show that the fundamental emissions are confined in the specified band and they are at least 50 dB below the carrier level at band edge (902 and 928 MHz). It meets the requirement of section 15.249(d).

Emission Plot

For electronic filing, the emission plots are saved with filename: emission.pdf

3.7 Line Conducted Configuration Photograph - Base Unit

Worst Case Line-Conducted Configuration

at 24.000 MHz

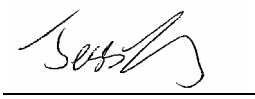
For electronic filing, the worst case line conducted configuration photographs are saved with filename: config photos.doc

3.8 Line Conducted Emission Data

The data on the following pages list the significant emission frequencies, the limit, and the margin of compliance.

Judgement : Passed by 7.6 dB margin

TEST PERSONNEL:



Tester Signature

Jess Tang, Engineer
Typed/Printed Name

October 4, 2002
Date

Company: Senton Enterprises Limited
Model: 39281

Date of Test: August 18, 2002

Conducted Emissions

For electronic filing, the conducted emission test result is saved with filename: conduct.pdf

EXHIBIT 4
EQUIPMENT PHOTOGRAPHS

4.0 Equipment Photographs

For electronic filing, the photographs are saved with filename: external photos.doc & internal photos.doc

EXHIBIT 5
PRODUCT LABELLING

5.0 Product Labelling

For electronic filing, the FCC ID label artwork and location is saved with filename: label.pdf

EXHIBIT 6
TECHNICAL SPECIFICATIONS

6.0 Technical Specifications

For electronic filing, the block diagram and circuit diagram are saved with filename: block.pdf and circuit.pdf respectively.

EXHIBIT 7
INSTRUCTION MANUAL

7.0 Instruction Manual

For electronic filing, a preliminary copy of the Instruction Manual is saved with filename: manual.pdf

Please note that the required FCC Information to the User is saved with filename: fcc information.pdf.

This manual will be provided to the end-user with each unit sold/leased in the United States.

EXHIBIT 8
SECURITY CODE INFORMATION

8.0 Security code information

The telephone has an internal security code with 65,536 possible combinations. Each time you pick up the HANDSET, the code is randomly set to a new combination.

Communication between HANDSET and BASE UNIT may not be possible in any of the following situation:

1. After a power failure.
2. After relocation the BASE UNIT by disconnecting the AC adaptor.
3. After replacing the HANDSET battery.
4. The HANDSET goes out of range from the BASE UNIT.

To reset, place the HANDSET on the BASE UNIT for 5 seconds.