

EMC Test Report

regarding

USA: CFR Title 47, Part 15.231 (Emissions)

Canada: ISSED RSS-210v10/GENv5 (Emissions)

for



49013933

Category: Passive and Keyless Entry Transmitter

Judgments:

Compliant 15.231/RSS-210v10 Transmitter

Testing Completed: July 5, 2022



Prepared for:

Morgan Olson, LLC

1801 S. Nottawa Street, Sturgis Michigan 49091 USA

Phone: +1 (269) 689-6028, Fax:

Contact: Peter Decoo, Peter.Decoo@MorganOlson.com

Data Rec./Rev. by:

Dr. Joseph Brunett, EMC-002790-NE

Rpt. Auth. by:

Dr. Joseph Brunett, EMC-002790-NE

Rpt. Prep./Rev. by:

John Nantz

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Revision History

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r0	July 28, 2022	Initial Release.	J. Brunett
r1	August 8, 2022	Add sample SNs.	J. Brunett

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1 Test Report Scope and Limitations

1.1 Laboratory Authorization

Test Facility description and attenuation characteristics are on file with the FCC Laboratory, Columbia, Maryland (FCC Reg. No: US5348 and US5356) and with ISED Canada, Ottawa, ON (File Ref. No: 3161A and 24249). Amber Helm Development L.C. holds accreditation under NVLAP Lab Code 200129-0.

1.2 Report Retention

For equipment verified to comply with the regulations herein, the manufacturer is obliged to retain this report with the product records for the life of the product, and no less than ten years. A copy of this Report will remain on file with this laboratory until August 2032.

1.3 Subcontracted Testing

This report does not contain data produced under subcontract.

1.4 Test Data

This test report contains data included within the laboratory's scope of accreditation. Any data in this report that is not covered under the laboratory's scope is clearly identified.

1.5 Limitation of Results

The test results contained in this report relate only to the item(s) tested. Any electrical or mechanical modification made to the test item subsequent to the test date shall invalidate the data presented in this report. Any electrical or mechanical modification made to the test item subsequent to this test date shall require reevaluation.

1.6 Copyright

This report shall not be reproduced, except in full, without the written approval of Amber Helm Development L.C.

1.7 Endorsements

This report shall not be used to claim product endorsement by any accrediting, regulatory, or governmental agency.

1.8 Test Location

The EUT was fully tested by **Amber Helm Development L.C.**, headquartered at 92723 Michigan Hwy-152, Sister Lakes, Michigan 49047 USA. Table 1 lists all sites employed herein. Specific test sites utilized are also listed in the test results sections of this report where needed.

Table 1: Test Site List.

Description	Location	Quality Num.
OATS (3 meter)	3615 E Grand River Rd., Williamston, Michigan 48895	OATSC

1.9 Traceability and Equipment Used

Pertinent test equipment used for measurements at this facility is listed in Table 2. The quality system employed at Amber Helm Development L.C. has been established to ensure all equipment has a clearly identifiable classification, calibration expiry date, and that all calibrations are traceable to the SI through NIST, other recognized national laboratories, accepted fundamental or natural physical constants, ratio type of calibration, or by comparison to consensus standards.

Table 2: Equipment List.

Description	Manufacturer/Model	SN	Quality Num.	Cal/Ver By / Date Due
Biconical	EMCO / 93110B	9802-3039	BICEMCO01	Keysight / Aug-2023
Log Periodic Antenna	EMCO / 3146	9305-3614	LOGEMCO01	Keysight / Aug-2023
BNC-BNC Coax	WRTL / RG58/U	001	CAB001-BLACK	AHD / Sept-2022
3.5-3.5MM Coax	PhaseFlex / PhaseFlex	001	CAB015-PURP	AHD / Dec-2022
Spectrum Analyzer	R & S / FSV30	101660	RSFSV30001	RS / Apr-2023
Quad Ridge Horn	Singer / A6100	C35200	HQR1TO18S01	Keysight / Aug-2022

2 Test Specifications and Procedures

2.1 Test Specification and General Procedures

The goal of Morgan Olson, LLC is to demonstrate that the Equipment Under Test (EUT) complies with the Rules and/or Directives below. Detailed in this report are the results of testing the Morgan Olson, LLC 49013933 for compliance to:

Country/Region	Rules or Directive	Referenced Section(s)
United States	Code of Federal Regulations	CFR Title 47, Part 15.231
Canada	ISED Canada	ISED RSS-210v10/GENv5

It has been determined that the equipment under test is subject to the rules and directives above at the date of this testing. In conjunction with these rules and directives, the following specifications and procedures are followed herein to demonstrate compliance (in whole or in part) with these regulations.

ANSI C63.4:2014	"Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz"
ANSI C63.10:2013	"American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices"
TP0102RA	"AHD Internal Document TP0102 - Radiated Emissions Test Procedure"
ISED Canada	"The Measurement of Occupied Bandwidth"
ICES-003; Issue 7 (2020)	"Information Technology Equipment (ITE) - Limits and methods of measurement"

3 Configuration and Identification of the Equipment Under Test

3.1 Description and Declarations

The equipment under test is a remote and keyless entry UHF transmitter. The EUT is approximately 5 x 7 x 1 cm in dimension, and is depicted in Figure 1. It is powered by 3 VDC Lithium cell battery. In use, this device is a hand held UHF transmitter. Table 3 outlines provider declared EUT specifications.



Figure 1: Photos of EUT.

Table 3: EUT Declarations.

General Declarations	
Equipment Type:	Passive and Keyless Entry Transmitter
Country of Origin:	Not Declared
Nominal Supply:	3 VDC
Oper. Temp Range:	Not Declared
Frequency Range:	433.92 MHz
Antenna Dimension:	Not Declared
Antenna Type:	PCB Trace
Antenna Gain:	-20 dBi (approx)
Number of Channels:	1
Channel Spacing:	N/A
Alignment Range:	Not Declared
Type of Modulation:	FSK
United States	
FCC ID Number:	2A7IH-12001PF12
Classification:	DSC
Canada	
IC Number:	28701-22001PF12
Classification:	Remote Control Device

3.1.1 EUT Configuration

The EUT is configured for testing as depicted in Figure 2.

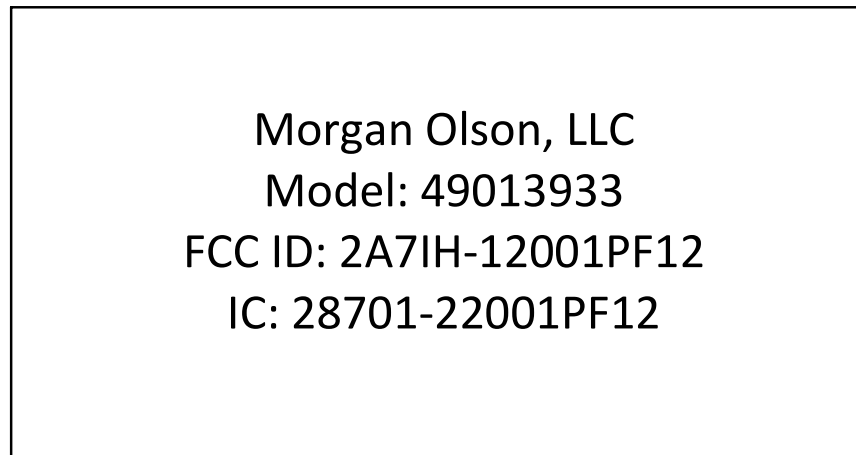


Figure 2: EUT Test Configuration Diagram.

3.1.2 Modes of Operation

This EUT is capable of transmitting in both a manual activated mode (normal button press) or when automatically activated (Passive Entry / Passive Start) mode wherein it responds to detection of an encoded LF signal. Both modes are evaluated herein, with the worst case (greatest) on-time demonstrated in the manual activated mode.

3.1.3 Variants

There is only a single variant of the EUT, as tested.

3.1.4 Test Samples

Two samples of the EUT were provided, including one normal operating sample (SN: EMC002) as well as one sample with CW firmware (SN: EMC003).

3.1.5 Functional Exerciser

Normal operating EUT functionality was verified by observation of transmitted signal.

3.1.6 Modifications Made

There were no modifications made to the EUT by this laboratory.

3.1.7 Production Intent

The EUT appears to be a production ready sample.

3.1.8 Declared Exemptions and Additional Product Notes

None.

4 Emissions

4.1 General Test Procedures

4.1.1 Radiated Test Setup and Procedures

Radiated electromagnetic emissions from the EUT are first pre-scanned in our screen room. Spectrum and modulation characteristics of all emissions are recorded. Instrumentation, including spectrum analyzers and other test equipment as detailed in Section 1.8 are employed. After pre-scan, emission measurements are made on the test site of record. If the EUT connects to auxiliary equipment and is table or floor standing, the configurations prescribed in relevant test standards are followed. Alternatively, a layout closest to normal use (as declared by the provider) is employed if the resulting emissions appear to be worst-case in such a configuration. See Figure 3. All intentionally radiating elements that are not fixed-mounted in use are placed on the test table lying flat, on their side, and on their end (3-axes) and the resulting worst case emissions are recorded. If the EUT is fixed-mounted in use, measurements are made with the device oriented in the manner consistent with installation and then emissions are recorded. If the EUT exhibits spurious emissions due to internal receiver circuitry, such emissions are measured with an appropriate carrier signal applied.

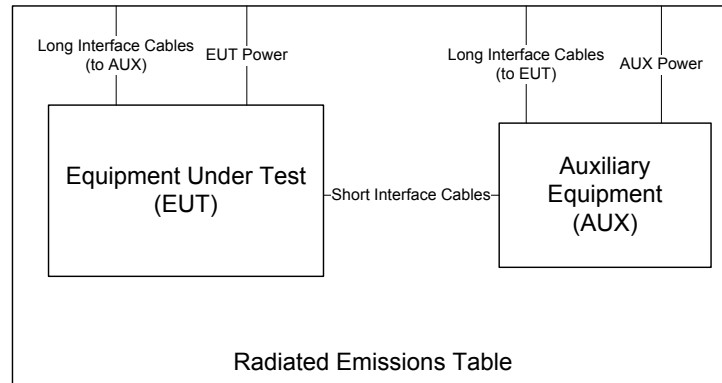


Figure 3: Radiated Emissions Diagram of the EUT.

For devices with intentional emissions below 30 MHz, a shielded loop antenna and/or E-field and H-Field broadband probes are used depending on the regulation. Shielded loops are placed at a 1 meter receive height at the desired measurement distance. For exposure in this band, 10cm diameter single-axis broadband probes meeting the requirements of ISSED SPR-002 section 5.2 are employed. Measurements are repeated and summed over three axes, and the entire frequency range is measured with and without the EUT transmitting.

Emissions between 30 MHz and 1 GHz are measured using calibrated broadband antennas. For both horizontal and vertical polarizations, the test antenna is raised and lowered from 1 to 4 m in height until a maximum emission level is detected. The EUT is then rotated through 360° in azimuth until the highest emission is detected. The test antenna is then raised and lowered one last time from 1 to 4 m and the worst case value is recorded. Emissions above 1 GHz are characterized using standard gain or broadband ridge-horn antennas on our OATS with a 4 × 5 m rectangle of ECCOSORB absorber covering the OATS ground screen and a 1.5m table height. Care is taken to ensure that test receiver resolution and video bandwidths meet the regulatory requirements, and that the emission bandwidth of the EUT is not reduced. Photographs of the test setup employed are depicted in Figure 4.

Where regulations allow for direct measurement of field strength, power values (dBm) measured on the test receiver / analyzer are converted to dBμV/m at the regulatory distance, using

$$E_{dist} = 107 + P_R + K_A - K_G + K_E - C_F$$

where P_R is the power recorded on spectrum analyzer, in dBm, K_A is the test antenna factor in dB/m, K_G is the combined pre-amplifier gain and cable loss in dB, K_E is duty correction factor (when applicable) in dB, and C_F is a distance conversion (employed only if limits are specified at alternate distance) in dB. This field strength value is then compared with the regulatory limit. If effective isotropic radiated power (EIRP) is computed, it is computed as

$$EIRP(dBm) = E_{3m}(dB\mu V/m) - 95.2.$$

When presenting data at each frequency, the highest measured emission under all possible EUT orientations (3-axes) is reported.

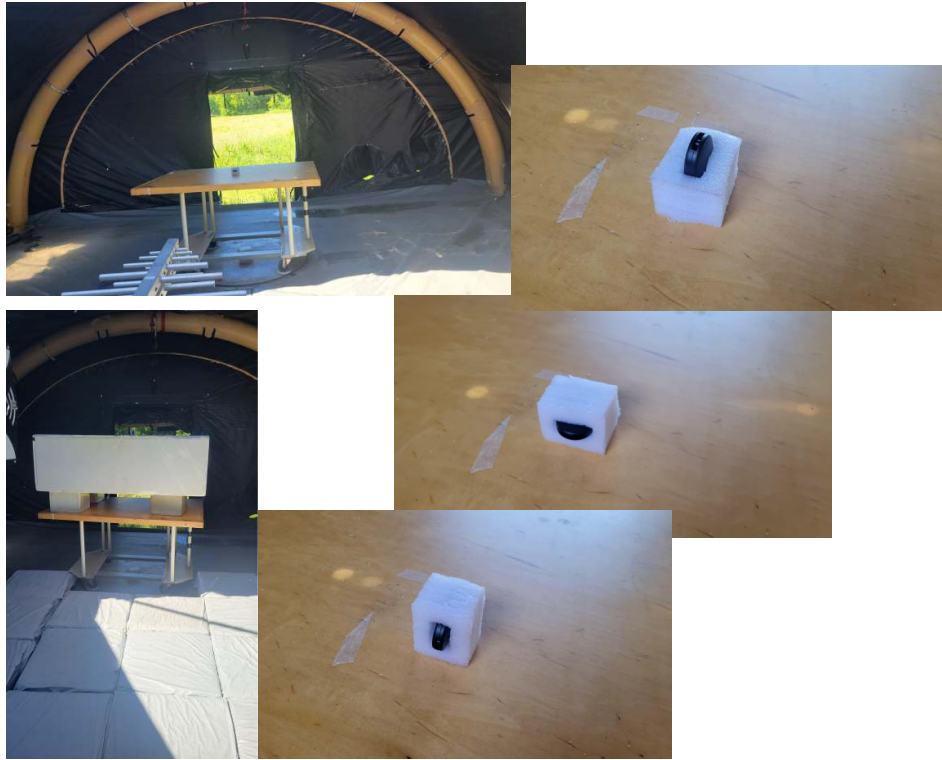


Figure 4: Radiated Emissions Test Setup Photograph(s).

4.1.2 Conducted Emissions Test Setup and Procedures

The EUT is not subject to measurement of power line conducted emissions as it is powered solely by its internal battery.

4.1.3 Power Supply Variation

Tests at extreme supply voltages are made if required by the procedures specified in the test standard, and results of this testing are detailed in this report.

In the case the EUT is designed for operation from a battery power source, the extreme test voltages are evaluated over the range specified in the test standard; no less than $\pm 10\%$ of the nominal battery voltage declared by the manufacturer. For all battery operated equipment, worst case intentional and spurious emissions are re-checked employing a new (fully charged) battery.

4.2 Intentional Emissions

4.2.1 Fundamental Emission Pulsed Operation

Test Setup & Procedure The test equipment and facilities were setup in accordance with the standards and procedures listed in Section 2.1. Environmental conditions were set at the appropriate temperature and thermal balance was checked with a thermocouple based probe. Duty cycle is reported for all relevant modes of operation. The test equipment employed includes RSFSV30001, LOGEMCO01.

Measurement Results The details and results of testing the EUT are summarized in Table 4. Plots showing the measurements made to obtain these values are provided in Figure 5.

Table 4: Fundamental Emission Pulsed Operation.

Detector	Span	IF Bandwidth	Video Bandwidth	Test Date:	15-Jun-22
Pk	0	1 MHz	3 MHz	Test Engineer:	J. Brunett
				EUT:	MO FOB
				EUT Mode:	Normal Operating
				Meas. Distance:	10 cm

FCC/IC										
R0	Test Freq. (MHz)	EUT Test Mode*	Overall Transmission			Internal Frame Characteristics			Computed Duty Cycle	
			Min. Repetition Rate (sec)	Max. No. of Frames	Total Transmission Length (sec)	Max. Frame Length (ms)	Min. Frame Period (ms)	Frame Encoding	(%)	(dB)
R1	433.92	Manual Activated Button Press (subfigure 5(a))	single	1	0.15	150.00	N/A	In the worse case, the EUT transmits a 150 ms FSK data frame, > 100 ms thus no duty is applicable.	100.0	0.0
R2	433.92	Automatic Encoded LF Activated (subfigure 5(b))	single	1	0.05	54.00	N/A	In the worse case, the EUT transmits a 54 ms FSK data frame. No duty is applied due to mode above.	54.0	0.0
#	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10

Example Calculation: 54 ms / 100 ms = 54 % on-time.

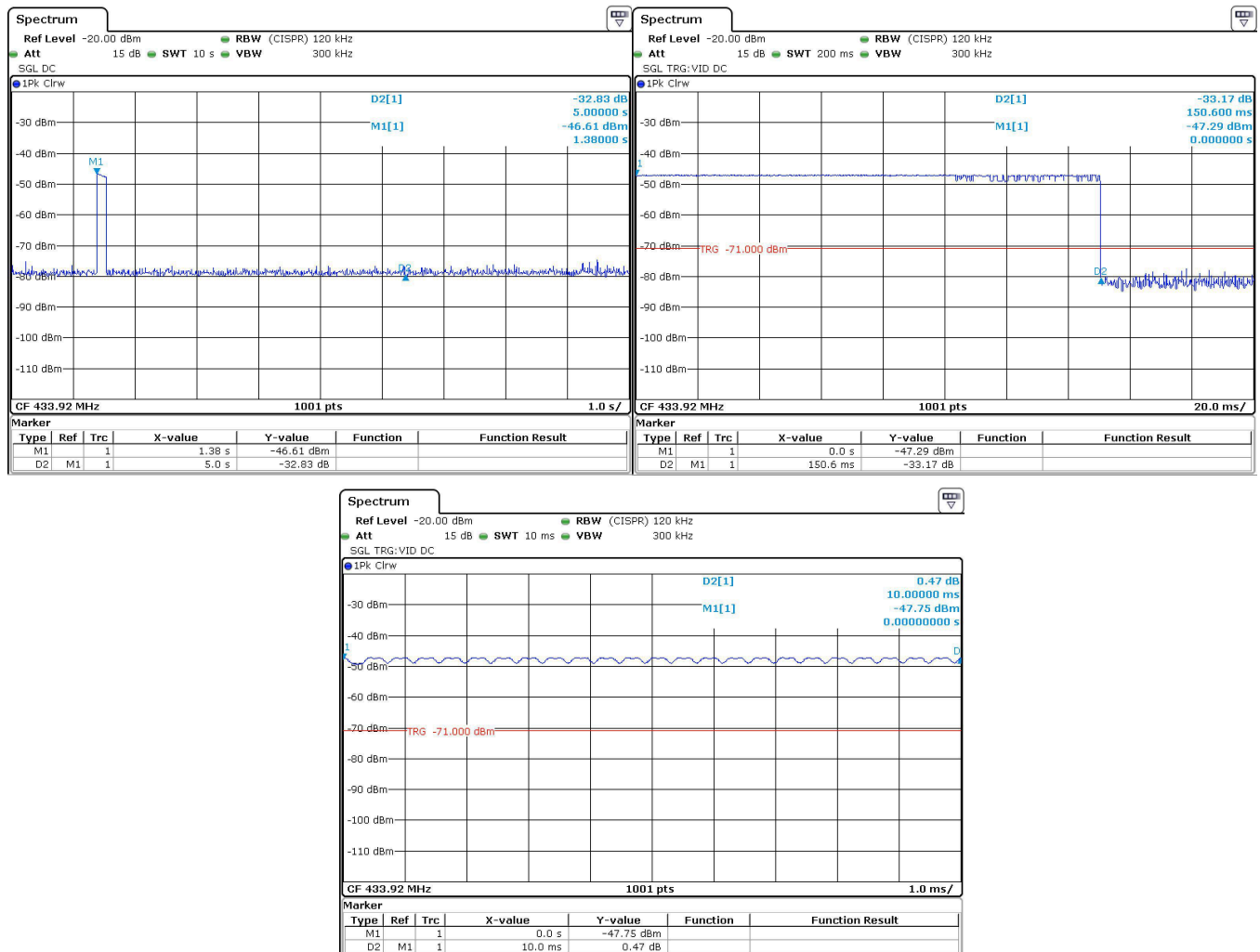


Figure 5(a): Fundamental Emission Pulsed Operation.

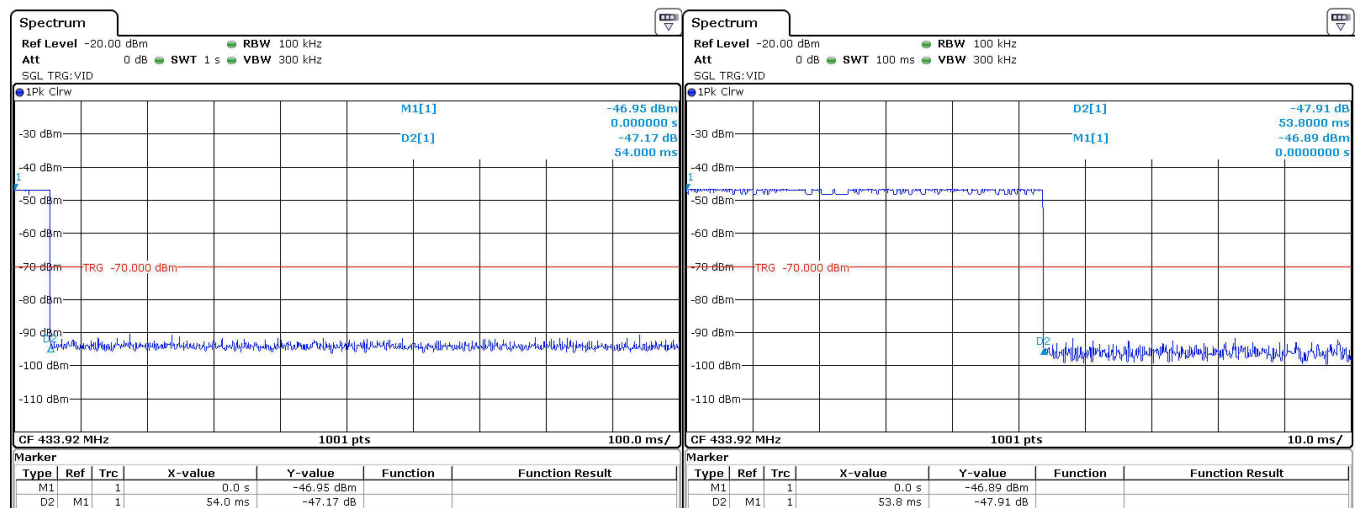


Figure 5(b): Fundamental Emission Pulsed Operation.

4.2.2 Fundamental Emission Bandwidth

Test Setup & Procedure The test equipment and facilities were setup in accordance with the standards and procedures listed in Section 2.1. Environmental conditions were set at the appropriate temperature and thermal balance was checked with a thermocouple based probe. Emission bandwidth (EBW) of the EUT is measured with the device placed in the test mode(s) with the shortest available frame length and minimum frame spacing. The 20 dB EBW is measured as the max-held peak-detected signal when the IF bandwidth is greater than or equal to 1% of the receiver span. For complex modulations other than ASK and FSK, the 99% emission bandwidth per IC test procedures has a different result, and is also reported. The test equipment employed includes RSFSV30001, LOGEMCO01.

Measurement Results The details and results of testing the EUT are summarized in Table 5. Plots showing the measurements made to obtain these values are provided in Figure 6.

Table 5: Fundamental Emission Bandwidth.

			Test Date:		15-Jun-22			
Detector			IF Bandwidth		Video Bandwidth		Test Engineer:	J. Brunett
Pk			10 kHz		100 kHz		EUT:	MO FOB
							EUT Mode:	Normal Operating
							Meas. Distance:	10 cm
FCC/IC								
R0	Mode	Center Frequency (MHz)	20 dB EBW (MHz)	EBW Limit (MHz)	99% OBW (MHz)	Accum. 20dB OBW (MHz)	Min EBW Limit (MHz)	
R1	FSK	433.92	0.099	1.085	95.900	N/A	N/A	
#	C1	C2	C3	C4	C5	C7	C8	

(ROW) (COLUMN) NOTE:

R0 C7 Per KDB 926416, for FCC 15.231 non-sweeping devices, total bandwidth is sum of the individual occupied 20 dB bandwidths. EUT employs 2 channels in the manual act mode, but only 1 channel in the automatic activated mode. OBW is restricted to 0.0025 (.25%) of the center frequency. 20dB EBWs summation is 0.069 MHz + 0.094 MHz = 0.164 MHz

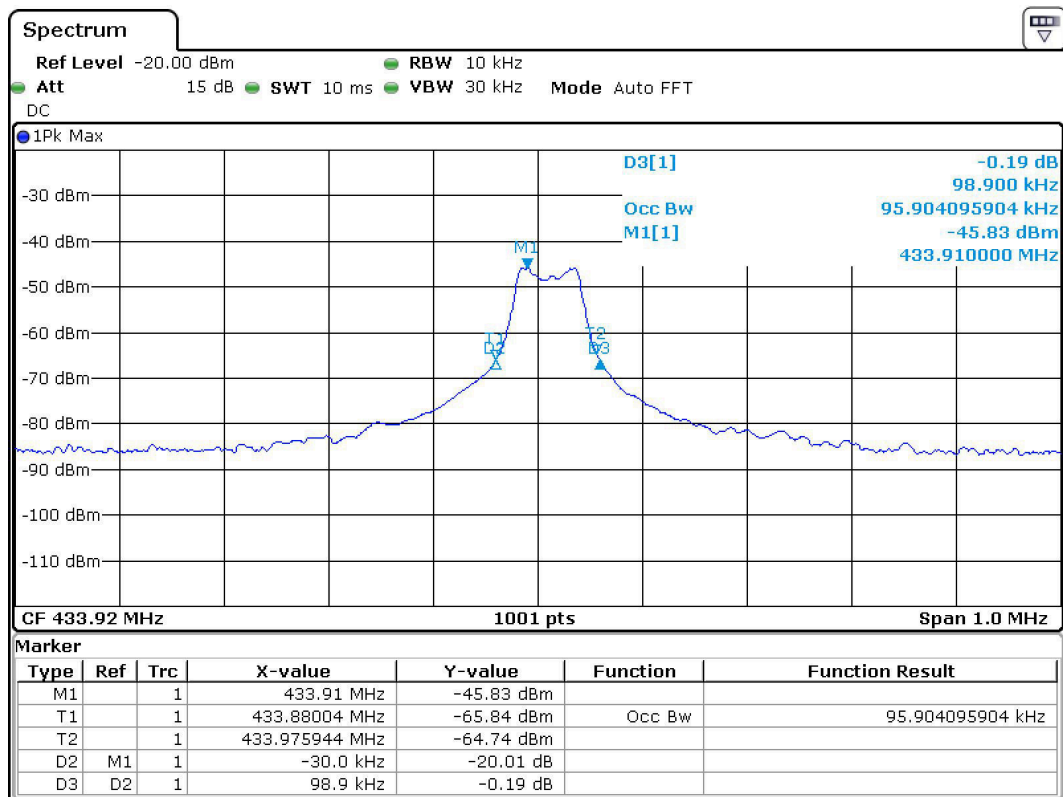


Figure 6: Fundamental Emission Bandwidth.

4.2.3 Fundamental Emission Field Strength

Test Setup & Procedure The test equipment and facilities were setup in accordance with the standards and procedures listed in Section 2.1. Environmental conditions were set at the appropriate temperature and thermal balance was checked with a thermocouple based probe. Fundamental emissions are measured at the regulatory distance on our OATS. The test equipment employed includes RSFSV30001, LOGEMCO01.

Measurement Results The details and results of testing the EUT are summarized in Table 6.

Table 6: Fundamental Emission Field Strength.

		EUT Modes:		a1	CW (C4 Setting)		a5
				a2			a6
Test Date(s):		06/15/22		a3			a7
Test Engineer:		J. Brunett		a4			a8

R0	Frequency		Site					EUT			Test Antenna				Cable	Receiver				Field Strength @ DR						EIRP		Details	
	Start	Stop	Temp.	Table	MR	DR	N/F	CF	Mode	Volt.	Dim	Pol.	Ant.	Dim.	Ka	Rx Power	Bandwidth		Meas.	Pk		Qpk / Avg		Pk					
	MHz	MHz	(C)	Angle	m	m	dB	table	(V)	cm	H/V	m	cm	dB/m	dB	dBm	MHz	0.12	0.30	76.3	Limit	Limit	Calc.	Limit	Calc.	dBm	Pass		
			Hum.	deg																								USA	CAN
			%																										
R1	SETUP		OATSC					MO FOB			EMCOLOG				CAB001	RSFSV30001				NOTES: H-POL - FLAT, V-POL END Worst Case Orient									
R2	433.9	433.9	37 / 45	90.0	3.0	3.0		0.0	a1	3.0	7.5	H	1.0	100.0	16.3	-0.1			0.12	0.30	76.3	100.8	100.8	76.3	80.8	80.8	-18.8	4.5	
R3	433.9	433.9	37 / 45	180.0	3.0	3.0		0.0	a1	3.0	7.5	V	1.3	100.0	16.3	-0.1			0.12	0.30	77.8	100.8	100.8	77.8	80.8	80.8	-17.3	3.0	
R4																													
R5																													
R6																													
R7																													
R8																													
R9																													
R10																													
R11																													
R12																													
#	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	C11	C12	C13	C14	C15	C16	C17	C18	C19	C20	C21	C22	C23	C24	C25	C26	C27	C28	C29

(ROW)	(COLUMN)	NOTE:
R0	C5	MR is Measurement Range, which is reduced from DR to achieve necessary SNR.
R0	C6	DR is the regulatory Desired Range measurement distance.
R0	C7	N/F is Near-Field / Far-Field distance computed for max of EUT Antenna Dimension (C10) computed above 1 GHz.
R0	C8	CF is computed using a 20 dB/decade Decay Rate.
R0	C17/18	When E-field or EIRP is reported directly from Spectrum Analyzer, Antenna Factors and Cable losses are included directly in SA settings and Pr is not reported.

4.3 Unintentional Emissions

4.3.1 Transmit Chain Spurious Emissions

The results for the measurement of transmit chain spurious emissions at the nominal voltage and temperature are provided in Table 7.

Table 7: Transmit Chain Spurious Emissions.

		EUT Modes: a1 CW (C4 Setting)														a5													
		a2														a6													
Test Date(s):		06/15/22														a3													
Test Engineer:		J. Brunett														a4													
																a8													
R0	Frequency		Temp. (C) Hum.	Table Angle deg	Site			EUT			Test Antenna			Cable Kg	Receiver			Field Strength @ DR				EIRP		Details					
	Start	Stop			MR	DR	N/F	CF	Mode	Volt.	Dim	Pol.	Ant. Height		Dim.	Ka	Rx Power	Bandwidth	Pk	Limit	Qpk / Avg	Limit	Calc.	Pass	Fail				
	MHz	MHz							sec	(V)	cm	H/V	m		cm	dB/m	dBm	RBW	VBW	Meas.	USA/CAN	dBuV/m	USA/CAN	dBm	dB				
					%				table										MHz										
R1	SETUP				OATSC			MO FOB			EMCOLOG			CAB001	RSFSV30001			NOTES: H-POL - FLAT, V-POL END Worst Case Orient											
R2	867.8	867.8	37 /45	220.0	3.0	3.0		0.0	a1	3.0	8.0	H	1.0	100.0	15.3	-0.2			0.12	0.30	34.5	80.8	80.8	34.5	60.8	60.8	-60.7		26.3
R3	867.8	867.8	37 /45	0.0	3.0	3.0		0.0	a1	3.0	8.0	V	1.0	100.0	15.3	-0.2			0.12	0.30	26.9	80.8	80.8	26.9	60.8	60.8	-68.3		33.9
R4	SETUP				OATSC			MO FOB			HRNSINGQR			CAB015	RSFSV30001			NOTES: max all orientations of EUT											
R5	1301.8	1301.8	37 /45	all	3.0	3.0	0.2	0.0	a1	3.0	8.0	H/V	all	15.0	22.0	-2.9			1.00	3.00	44.0	74.0	74.0	44.0	54.0	54.0	-51.2		10.0
R6	1735.7	1735.7	37 /45	all	3.0	3.0	0.3	0.0	a1	3.0	8.0	H/V	all	15.0	26.7	-3.4			1.00	3.00	37.1	80.8	80.8	37.1	60.8	60.8	-58.1		23.7
R7	2169.6	2169.6	37 /45	all	3.0	3.0	0.3	0.0	a1	3.0	8.0	H/V	all	15.0	29.6	-3.9			1.00	3.00	52.1	80.8	80.8	52.1	60.8	60.8	-43.1		8.7
R8	2603.5	2603.5	37 /45	all	3.0	3.0	0.4	0.0	a1	3.0	8.0	H/V	all	15.0	31.1	-4.4			1.00	3.00	49.8	80.8	80.8	49.8	60.8	60.8	-45.4		11.0
R9	3037.4	3037.4	37 /45	all	3.0	3.0	0.5	0.0	a1	3.0	8.0	H/V	all	15.0	31.8	-4.9			1.00	3.00	51.1	80.8	80.8	51.1	60.8	60.8	-44.1		9.7
R10	3471.4	3471.4	37 /45	all	3.0	3.0	0.5	0.0	a1	3.0	8.0	H/V	all	15.0	31.9	-5.4			1.00	3.00	45.6	80.8	80.8	45.6	60.8	60.8	-49.6		15.2
R11	3905.3	3905.3	37 /45	all	3.0	3.0	0.6	0.0	a1	3.0	8.0	H/V	all	15.0	32.0	-5.9			1.00	3.00	46.7	74.0	74.0	46.7	54.0	54.0	-48.5		7.3
R12	4339.2	4339.2	37 /45	all	3.0	3.0	0.7	0.0	a1	4.0	8.0	H/V	all	15.0	32.3	-6.3			1.00	3.00	41.3	74.0	74.0	41.3	54.0	54.0	-53.9		12.7
R13																													
#	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	C11	C12	C13	C14	C15	C16	C17	C18	C19	C20	C21	C22	C23	C24	C25	C26	C27	C28	C29
(ROW)	(COLUMN)		NOTE:																										
R0	C5		MR is Measurement Range, which is reduced from DR to achieve necessary SNR.																										
R0	C6		DR is the regulatory Desired Range measurement distance.																										
R0	C7		N/F is Near-Field / Far-Field distance computed for max of EUT Antenna Dimension (C10) computed above 1 GHz.																										
R0	C8		CF is computed using a 20 dB/decade Decay Rate.																										
R0	C17/18		When E-field or EIRP is reported directly from Spectrum Analyzer, Antenna Factors and Cable losses are included directly in SA settings and Pr is not reported.																										
R3/R16	C21		Measured signal was background noise.																										

4.3.2 Radiated Digital Spurious

The results for the measurement of digital spurious emissions are not reported herein as all digital emissions were greater than 20 dB below the regulatory limit. Radiation from digital components was measured to 1 GHz, or to five times the maximum digital component operating frequency, whichever is greater.

5 Measurement Uncertainty and Accreditation Documents

The maximum values of measurement uncertainty for the laboratory test equipment and facilities associated with each test are given in the table below. This uncertainty is computed for a 95.45% confidence level based on a coverage factor of $k = 2$.

Table 8: Measurement Uncertainty.

Measured Parameter	Measurement Uncertainty [†]
Radio Frequency	$\pm(f_{Mkr}/10^7 + RBW/10 + (SPN/(PTS - 1))/2 + 1 \text{ Hz})$
Conducted Emm. Amplitude	$\pm 1.9 \text{ dB}$
Radiated Emm. Amplitude ($f < 30 \text{ MHz}$)	$\pm 3.1 \text{ dB}$
Radiated Emm. Amplitude (30 – 200 MHz)	$\pm 4.0 \text{ dB}$
Radiated Emm. Amplitude (200 – 1000 MHz)	$\pm 5.2 \text{ dB}$
Radiated Emm. Amplitude ($f > 1000 \text{ MHz}$)	$\pm 3.7 \text{ dB}$

[†]Ref: CISPR 16-4-2:2011+A1:2014



Figure 7: Accreditation Documents