TEST REPORT

Client Information:

Applicant:	M5Stack Technology Co., Ltd
Applicant add.:	Block A10, Expo Bay South Coast, Fuhai Street, Bao'an District, Shenzhen, China
Manufacturer:	M5Stack Technology Co., Ltd
Manufacturer add.:	Block A10, Expo Bay South Coast, Fuhai Street, Bao'an District, Shenzhen, China

Product Information:

Product Name:	M5ToughC5
Model No:	ToughC5
Brand Name:	M5STACK
FCC ID:	2AN3WM5TOUGHC5

Applicable standards: FCC CFR Title 47 Part 15 Subpart C Section 15.247

Prepared By:

Dongguan Yaxu (AiT) Technology Limited

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Date of Receipt:	Jun. 24, 2026	Date of Test:	Jun. 24, 2026 ~ Jul. 13, 2026
Date of Issue:	Jul. 14, 2026	Test Result:	Pass

This device described above has been tested by Dongguan Yaxu (AiT) Technology Limited and the test results show that the equipment under test (EUT) is in compliance with the FCC requirements. And it is applicable only to the tested sample identified in the report.

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Reviewed by: Emiya Lin
Emiya Lin

Approved by: Simba Huang
Simba Huang

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REPORT REVISE RECORD

Report Version	Revise Time	Issued Date	Valid Version	Notes
V1.0	/	Jul. 14, 2026	Valid	Initial release

2 Test Summary

Test Item	Section in CFR 47	Result
Antenna requirement	§15.203	Pass
On Time and Duty Cycle	/	/
AC Power Line Conducted Emission	§ 15.207(a)	Pass
Conducted Peak Output Power	§15.247 (b)(3)	Pass
Channel Bandwidth	§15.247 (a)(2)	Pass
Power Spectral Density	§15.247 (e)	Pass
Transmitter Radiated Spurious Emission	§15.205/15.209	Pass
Restricted Bands	§15.205/15.209	Pass
Conducted Unwanted emissions and Bandedge	§15.205, §15.247(d)	Pass

Note

1. Test according to ANSI C63.10:2020.
2. The measurement uncertainty is not included in the test result.

2.1 Statement of the Measurement Uncertainty

The data and results referenced in this document are true and accurate. The reader is cautioned that there may be errors within the calibration limits of the equipment and facilities. The measurement uncertainty was calculated for all measurements listed in this test report acc. To CISPR 16 – 4 “Specification for radio disturbance and immunity measuring apparatus and methods – Part 4: Uncertainty in EMC Measurements” and is documented in the AiT quality system acc. To DIN EN ISO/IEC 17025. Furthermore, component and process variability of devices similar to that tested may result in additional deviation. The manufacturer has the sole responsibility of continued compliance of the device.

2.2 Measurement Uncertainty

Test Item	Frequency Range	Measurement Uncertainty	Notes
Radiated Emission	0.009MHz-30MHz	3.10dB	(1)
Radiated Emission	30MHz-1GHz	3.75dB	(1)
Radiated Emission	1GHz-18GHz	3.88dB	(1)
Radiated Emission	18GHz-40GHz	3.88dB	(1)
AC Power Line Conducted Emission	0.15MHz ~ 30MHz	1.20dB	(1)
Note (1): The measurement uncertainty is for coverage factor of k=2 and a level of confidence of 95%.			

3 Test Facility

The test facility is recognized, certified or accredited by the following organizations:

CNAS-Registration No: L6177

Dongguan Yaxu (AiT) technology Limited is accredited to ISO/IEC 17025:2017 general Requirements for the competence of testing and calibration laboratories (CNAS-CL01 Accreditation Criteria for the competence of testing and calibration laboratories) on April 18, 2022

FCC-Registration No.: 362653 Designation Number: CN1457

Dongguan Yaxu (AiT) technology Limited has been registered and fully described in a report filed with the (FCC) Federal Communications Commission. The acceptance letter from the FCC is maintained in our files.

IC-Registration No.: 6819A CAB identifier: CN0122

The 3m Semi-anechoic chamber of Dongguan Yaxu (AiT) technology Limited has been registered by Certification and Engineering Bureau of Industry Canada for radio equipment testing with Registration No.: 6819A

A2LA-Lab Cert. No.: 6317.01

Dongguan Yaxu (AiT) technology Limited has been accredited by A2LA for technical competence in the field of electrical testing, and proved to be in compliance with ISO/IEC 17025: 2017 General Requirements for the Competence of Testing and Calibration Laboratories and any additional program requirements in the identified field of testing.

3.1 Deviation from standard

None

3.2 Abnormalities from standard conditions

None

3.3 Test Location

Dongguan Yaxu (AiT) Technology Limited

Address: No. 22, Jinqianling 3rd Street, Jitigang, Huangjiang, Dongguan, Guangdong, China.

Tel.: +86-769-8202 0499

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4 General Information

EUT Name:	M5ToughC5
Model No:	ToughC5
Serial Model:	N/A
Test sample(s) ID:	AiTDG-260624004-1
Sample(s) Status:	Engineer sample
Serial No.:	N/A
Operation frequency:	2402MHz-2480MHz
Channel Number:	40 channels
Channel separation:	2MHz
Modulation Technology:	GFSK
Antenna Type:	FPC Antenna
Antenna gain:	2.23dBi
H/W No.:	N/A
S/W No.:	N/A
Power supply:	DC 5.0V from external circuit
Model different:	N/A
Note:	
1.	For a more detailed features description, please refer to the manufacturer's specifications or the User's Manual.

4.1 Test frequencies

EUT channels and frequencies list:

Channel	Frequency (MHz)	Channel	Frequency (MHz)	Channel	Frequency (MHz)
00	2402	14	2430	28	2458
01	2404	15	2432	29	2460
02	2406	16	2434	30	2462
03	2408	17	2436	31	2464
04	2410	18	2438	32	2466
05	2412	19	2440	33	2468
06	2414	20	2442	34	2470
07	2416	21	2444	35	2472
08	2418	22	2446	36	2474
09	2420	23	2448	37	2476
10	2422	24	2450	38	2478
11	2424	25	2452	39	2480
12	2426	26	2454	--	--
13	2428	27	2456	--	--

4.2 EUT Peripheral List

No.	Equipment	Manufacturer	Model No.	Serial No.	Power cord	Remark
1	N/A	N/A	N/A	N/A	N/A	N/A

4.3 Test Peripheral List

No.	Equipment	Manufacturer	Model No.	Serial No.	Power cord	Remark
1	Notebook	ASUS	S4200	N/A	N/A	N/A
2	Adapter	TEKA	TEKA018-120 1500UK	N/A	N/A	N/A

4.4 TEST METHODOLOGY

All measurements contained in this report were conducted with ANSI C63.10:2020, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices.

The radiated testing was performed at an antenna-to-EUT distance of 3 meters. All radiated and conducted emissions measurement was performed at Dongguan Yaxu (AiT) Technology Limited

4.4.1 EUT Configuration

The EUT configuration for testing is installed on RF field strength measurement to meet the Commissions requirement and operating in a manner that intends to maximize its emission characteristics in a continuous normal application.

4.4.2 EUT Exercise

The EUT was operated in the engineering mode to fix the TX frequency that was for the purpose of the measurements.

According to its specifications, the EUT must comply with the requirements of the Section 15.203, 15.205, 15.207, 15.209, 15.247 under the FCC Rules Part 15 Subpart C.

4.4.3 General Test Procedures

Conducted Emissions

The EUT is placed on the turntable, which is 0.8 m above ground plane. According to the requirements in Section 6.2.1 of ANSI C63.10:2020 Conducted emissions from the EUT measured in the frequency range between 0.15 MHz and 30MHz using Quasi-peak and average detector modes.

Radiated Emissions

The EUT is placed on a turn table, which is 0.8 m above ground plane. The turntable shall rotate 360 degrees to determine the position of maximum emission level. EUT is set 3m away from the receiving antenna, which varied from 1m to 4m to find out the highest emission. And also, each emission was to be maximized by changing the polarization of receiving antenna both horizontal and vertical. In order to find out the maximum emissions, exploratory radiated emission measurements were made according to the requirements in Section 6.3 of ANSI C63.10:2020.

4.5 Description of Test Modes

The EUT has been tested under operating condition.

This test was performed with EUT in X, Y, Z position and the worst case was found when EUT in X position.

AC conducted emission pre-test at both at AC 120V/60Hz and AC 240V/50Hz modes, recorded worst case.

Worst-case mode and channel used for 150 KHz-30 MHz power line conducted emissions was the mode and channel with the highest output power, which was determined to be BT LE mode (Low Channel).

Worst-case mode and channel used for 9 KHz-1000 MHz radiated emissions was the mode and channel with the highest output power, that was determined to be BT LE mode (Low Channel).

Worst-Case data rates were utilized from preliminary testing of the Chipset, worst-case data rates used during the testing are as follows:

BT LE: 1 Mbps, GFSK.

In section 15.31(m), regards to the operating frequency range over 10 MHz, the Lowest frequency, the middle frequency, and the highest frequency of channel were selected to perform the test, and the selected channel see below:

Transmitting mode	Keep the EUT in continuously transmitting mode.		
Test software:	EspRFTestTool_v5.71_Manual		
Frequency	2402 MHz	2440 MHz	2480 MHz
Parameters(1 Mbps)	8	8	8
Parameters(2 Mbps)	8	8	8

5 Equipment Used during Test

No	Test Equipment	Manufacturer	Model No	Serial No	Cal. Date	Cal. Due Date
1	Spectrum Analyzer	R&S	FSV40	101470	2025.09.25	2026.09.24
2	EMI Measuring Receiver	R&S	ESPI	100773	2025.09.25	2026.09.24
3	Low Noise Pre Amplifier	HP	HP8447E	1937A01855	2025.09.25	2026.09.24
4	Low Noise Pre Amplifier	Tsj	MLA-0120-A02-34	2648A04738	2025.09.25	2026.09.24
5	Passive Loop	ETS	6512	00165355	2024.09.04	2026.09.03
6	TRILOG Super Broadband test Antenna	SCHWARZBECK	VULB9160	9160-3206	2024.08.29	2026.08.28
7	Broadband Horn Antenna	SCHWARZBECK	BBHA9120D	452	2024.08.29	2026.08.28
8	SHF-EHF Horn Antenna 15-40GHz	SCHWARZBECK	BBHA9170	BBHA9170367d	2023.09.12	2026.09.11
9	EMI Test Receiver	R&S	ESCI	100124	2025.09.25	2026.09.24
10	LISN	R&S	ESH3-Z5	892785/016	2025.09.25	2026.09.24
11	Pro.Temp&Humi.chamber	MENTEK	MHP-150-1C	MAA08112501	2025.09.25	2026.09.24
12	RF Automatic Test system	MW	MW100-RFCB	21033016	2025.09.25	2026.09.24
13	Signal Generator	Agilent	N5182A	MY50143009	2025.09.25	2026.09.24
14	Wideband Radio communication tester	R&S	CMW500	1201.0002K50	2025.09.25	2026.09.24
15	RF Automatic Test system	MW	MW100-RFCB	21033016	2025.09.25	2026.09.24
16	Pulse Limiter	R&S	ESH3-Z2	03578810.54	2025.09.25	2026.09.24
17	Switch	MFJ Rhinos	MFJ-2702	CZ3457	2025.09.25	2026.09.24
18	DC power supply	ZHAOXIN	RXN-305D-2	28070002559	N/A	N/A
19	RE Software	EZ	EZ-EMC_RE	Ver.AIT-03A	N/A	N/A
20	CE Software	EZ	EZ-EMC_CE	Ver.AIT-03A	N/A	N/A
21	RF Software	MW	MTS 8310	2.0.0.0	N/A	N/A
22	temporary antenna connector(Note)	NTS	R001	N/A	N/A	N/A

Note: The temporary antenna connector is soldered on the PCB board in order to perform conducted tests and this temporary antenna connector is listed in the equipment list.

6 Test results and Measurement Data

6.1 Antenna requirement

Standard requirement:
FCC §15.203:Testing shall be performed using the highest gain antenna of each combination of licence-exempt transmitter and antenna type, with the transmitter output power set at the maximum level.9 When a measurement at the antenna connector is used to determine RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna manufacturer. An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this Section. The manufacturer may design the unit so that a broken antenna can be re-placed by the user, but the use of a standard antenna jack or electrical connector is prohibited. This requirement does not apply to carrier current devices or to devices operated under the provisions of Sections 15.211, 15.213, 15.217, 15.219, or 15.221. Further, this requirement does not apply to intentional radiators that must be professionally installed, such as perimeter protection systems and some field disturbance sensors, or to other intentional radiators which, in accordance with Section 15.31(d), must be measured at the installation site. However, the installer shall be responsible for ensuring that the proper antenna is employed so that the limits in this Part are not exceeded. And according to §15.247(4)(1), system operating in the 2400-2483.5MHz bands that are used exclusively for fixed, point-to-point operations may employ transmitting antennas with directional gain greater than 6dBi provided the maximum peak output power of the intentional radiator is reduced by 1 dB for every 3 dB that the directional gain of the antenna exceeds 6dBi.
EUT Antenna:
Note: The antenna information refer the manufacturer provide report, applicable only to the tested sa-mple identified in the report, reference to the Internal photos for details.

6.2 On Time and Duty Cycle

Standard requirement:

None; for reporting purpose only

Measuring Instruments and Setting:

Please refer to equipments list in this report. The following table is the setting of the spectrum analyser.

Test Procedures

According to ANSI C63.10-2020 Section 11.6

b) The zero-span mode on a spectrum analyzer or EMI receiver if the response time and spacing between bins on the sweep are sufficient to permit accurate measurements of the ON and OFF times of the transmitted signal:

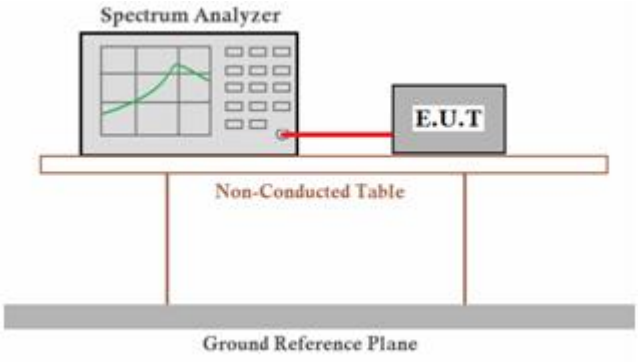
1) Set the center frequency of the instrument to the center frequency of the transmission.

2) Set RBW ≥ OBW if possible; otherwise, set RBW to the largest available value.

3) Set VBW ≥ RBW. Set detector = peak or average.

4) The zero-span measurement method shall not be used unless both RBW and VBW are > 50/T and the number of sweep points across duration T exceeds 100. (For example, if VBW and/or RBW are limited to 3 MHz, then the zero-span method of measuring the duty cycle shall not be used if T ≤ 16.7 μs.)

Test Setup Layout



EUT Operation during Test

The EUT was programmed to be in continuously transmitting mode.

Test result

For reporting purpose only.

Please refer to Appendix B.1

6.3 Maximum Conducted Output Power Measurement

Standard requirement:

According to §15.247(b): For systems using digital modulation in the 2400-2483.5 MHz and 5725-5850 MHz band, the limit for maximum peak conducted output power is 30dBm. The limited has to be reduced by the amount in dB that the gain of the antenna exceeds 6dBi. In case of point-to-point operation, the limit has to be reduced by 1dB for every 3dB that the directional gain of the antenna exceeds 6dBi.

Systems operating in the 5725-5850 MHz band that are used exclusively for fixed, point-to-point operations may employ transmitting antennas with directional gain greater than 6dBi without any corresponding reduction in transmitter peak output power.RSS-247 section 5.4 d): For DTSs employing digital modulation techniques operating in the bands 902-928 MHz and 2400-2483.5 MHz, the maximum peak conducted output power shall not exceed 1W. The e.i.r.p. shall not exceed 4 W, except as provided in section 5.4(e).

As an alternative to a peak power measurement, compliance can be based on a measurement of the maximum conducted output power. The maximum conducted output power is the total transmit power delivered to all antennas and antenna elements, averaged across all symbols in the signalling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or transmitting at a reduced power level. If multiple modes of operation are implemented, the maximum conducted output power is the highest total transmit power occurring in any mode.

Measuring Instruments:

Please refer to equipment's list in this report.

Test Procedures

According to ANSI C63.10-2020 Section 11.9.1.1

The following procedure shall be used when an instrument with a resolution bandwidth that is greater than the DTS bandwidth is available to perform the measurement:

a) Set the RBW ≥ DTS bandwidth.

b) Set VBW ≥ [3 x RBW].

c) Set span ≥ [3 x RBW].

d) Sweep time = No faster than coupled (auto) time.

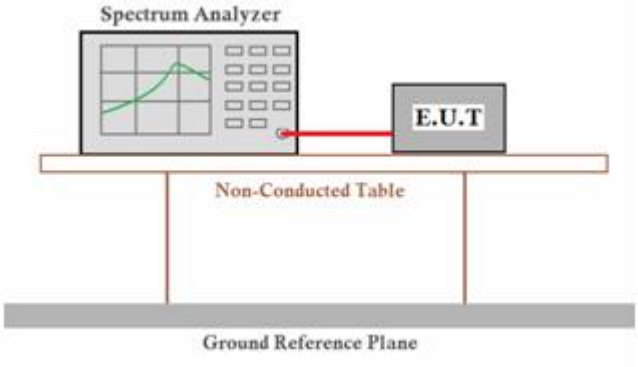
e) Detector = peak.

f) Trace mode = max-hold.

g) Allow trace to fully stabilize.

h) Use peak marker function to determine the peak amplitude level.

Test Setup Layout



EUT Operation during Test

The EUT was programmed to be in continuously transmitting mode.

Test result

PASS. **Please refer to Appendix B.2**

Remark: 1) Test results including cable loss.

6.4 6 dB Spectrum Bandwidth Measurement

Standard requirement:

According to FCC Part15 C Section 15.247 (a)(2)/ RSS 247 section 5.2(a): DTSs include systems that employ digital modulation techniques resulting in spectral characteristics similar to direct sequence systems. The following applies to the bands 902-928 MHz and 2400- 2483.5 MHz:

a). The minimum 6 dB bandwidth shall be 500 kHz.

Measuring Instruments and Setting:

Please refer to equipment's list in this report.

Test Procedures

According to ANSI C63.10-2020 Section 11.8.1

a) Set RBW = shall be in the range of 1% to 5% of the OBW but not less than 100 kHz.

b) Set the VBW ≥ [3 x RBW].

c) Detector = peak.

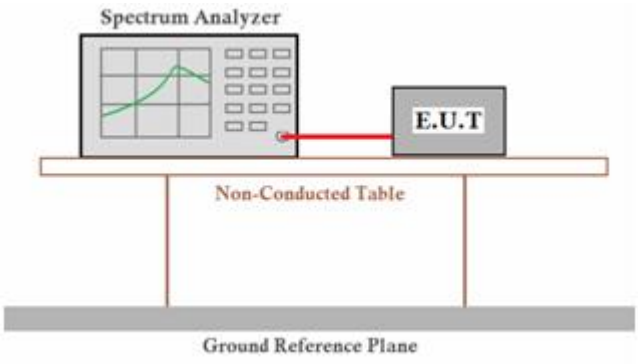
d) Trace mode = max-hold.

e) Sweep = No faster than coupled (auto) time.

f) Allow the trace to stabilize.

g) Measure the maximum width of the emission by placing two markers, one at the lowest frequency and the other at the highest frequency of the envelope of the spectral display, such that each marker is at or slightly below the "−6 dB down amplitude". If a marker is below this "−6 dB down amplitude" value, then it shall be as close as possible to this value.

Test Setup Layout



EUT Operation during Test

The EUT was programmed to be in continuously transmitting mode.

Test result

PASS

Please refer to Appendix B.3

Remark:

1). Measured 6dB Bandwidth at difference data rate for each mode and recorded worst case for each mode.

2). Test results including cable loss;

6.5 Power Spectral Density

Standard requirement:

According to FCC §15.247(e)/RSS-247 section 5.2 b): The transmitter power spectral density conducted from the transmitter to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission. This power spectral density shall be determined in accordance with the provisions of section 5.4(d), (i.e. the power spectral density shall be determined using the same method as is used to determine the conducted output power).

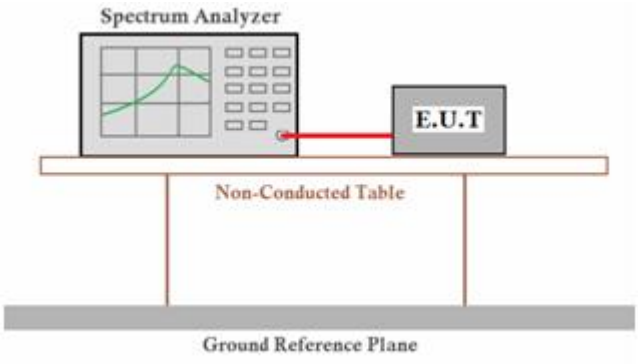
Measuring Instruments:

Please refer to equipment's list in this report.

Test Procedures

1. Use this procedure when the maximum peak conducted output power in the fundamental emission is used to demonstrate compliance.
2. The power was monitored at the coupler port with a Spectrum Analyzer. The power level was set to the maximum level.
3. Set the RBW = 3 kHz.
4. Set the VBW ≥ 3*RBW
5. Set the span to 1.5 times the DTS channel bandwidth.
6. Detector = peak.
7. Sweep time = auto couple.
8. Trace mode = max hold.
9. Allow trace to fully stabilize.
10. Use the peak marker function to determine the maximum power level.
11. If measured value exceeds limit, reduce RBW (no less than 3 kHz) and repeat.
12. The resulting peak PSD level must be 8 dBm.

Test Setup Layout



EUT Operation during Test

The EUT was programmed to be in continuously transmitting mode.

Test result

PASS

Please refer to Appendix B.4

Remark: 1). Test results including cable loss;

6.6 Conducted Spurious Emissions and Band Edges Test

Standard requirement:

According to FCC §15.247 (d)/ RSS 247 section 5.5: In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement. Attenuation below the general limits specified in Section 15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in Section 15.205(a), must also comply with the radiated emission limits specified in Section 15.209(a) (see Section 15.205(c)).

Measuring Instruments and Setting:

Please refer to equipment list in this report. The following table is the setting of the spectrum analyzer.

Spectrum Parameter	Setting
Detector	Peak
Attenuation	Auto
RB / VB (Emission in restricted band)	100KHz/300KHz
RB / VB (Emission in non-restricted band)	100KHz/300KHz

Test Procedures

The transmitter output is connected to a spectrum analyzer. The resolution bandwidth is set to 100 kHz. The video bandwidth is set to 300 kHz

The spectrum from 9 kHz to 26.5GHz is investigated with the transmitter set to the lowest, middle, and highest channels.

Test Setup Layout

This test setup layout is the same as that shown in section 5.4.4.

EUT Operation during Test

The EUT was programmed to be in continuously transmitting mode.

Test result

PASS

Please refer to Appendix B.6 for conducted spurious emissions;

Please refer to Appendix B.5 for conducted band edge emission.

Remark:

1). Test results including cable loss;

2). “---“means that the fundamental frequency not for RSS-Gen limits requirement.

3). Not recorded emission from 9 KHz to 30 MHz as emission level at least 20dBc lower than emission limit.

6.7 Restrict-band Band-edge Measurements

Standard requirement:

According to §15.247(d)/§15.209/ §15.205 or RSS-247§8.10/RSS-Gen

In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c)).

Measuring Instruments and Setting:

Please refer to equipment list in this report.

Test Procedures

According to KDB 558074 D01 for Antenna-port conducted measurement. Antenna-port conducted measurements may also be used as an alternative to radiated measurements for demonstrating compliance in the restricted frequency bands. If conducted measurements are performed, then proper impedance matching must be ensured and an additional radiated test for cabinet/case spurious emissions is required.

1). Check the calibration of the measuring instrument using either an internal calibrator or a known signal from an external generator.

2). Remove the antenna from the EUT and then connect to a low loss RF cable from the antenna port to an EMI test receiver, then turn on the EUT and make it operate in transmitting mode. Then set it to Low Channel and High Channel within its operating range, and make sure the instrument is operated in its linear range.

3). Set both RBW and VBW of spectrum analyzer to 100 kHz with a convenient frequency span including 100kHz bandwidth from band edge, for Radiated emissions restricted band RBW=1MHz, VBW=3MHz for peak detector and RBW=1MHz, VBW=1/B for AV detector.

4). Measure the highest amplitude appearing on spectral display and set it as a reference level. Plot the graph with marking the highest point and edge frequency.

5). Repeat above procedures until all measured frequencies were complete.

6). Measure the conducted output power (in dBm) using the detector specified by the appropriate regulatory agency (see 12.2.2, 12.2.3, and 12.2.4 for guidance regarding measurement procedures for determining quasi-peak, peak, and average conducted output power, respectively).

7). Add the maximum transmit antenna gain (in dBi) to the measured output power level to determine the EIRP level (see 12.2.5 for guidance on determining the applicable antenna gain)

8). Add the appropriate maximum ground reflection factor to the EIRP level (6 dB for frequencies ≤ 30 MHz, 4.7 dB for frequencies between 30 MHz and 1000 MHz, inclusive and 0 dB for frequencies > 1000 MHz).

9). For devices with multiple antenna-ports, measure the power of each individual chain and sum the EIRP of all chains in linear terms (e.g., Watts, mW).

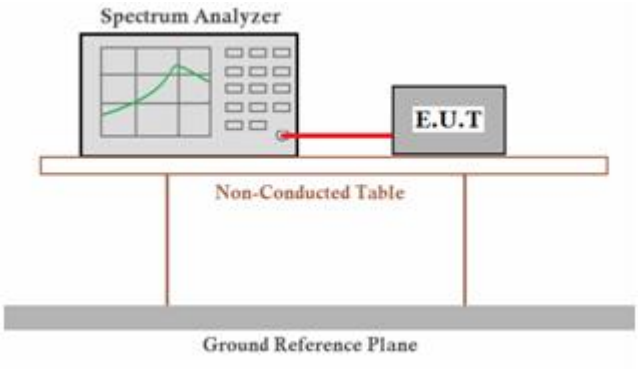
10). Convert the resultant EIRP level to an equivalent electric field strength using the following

relationship:

E = EIRP – 20log D + 104.77=EIRP+95.23

Where:
E = electric field strength in dBμV/m,
EIRP = equivalent isotropic radiated power in dBm
D = specified measurement distance in meters.
11). Since the out-of-band characteristics of the EUT transmit antenna will often be unknown, the use of a conservative antenna gain value is necessary. Thus, when determining the EIRP based on the measured conducted power, the upper bound on antenna gain for a device with a single RF output shall be selected as the maximum in-band gain of the antenna across all operating bands, or 2 dBi, whichever is greater. However, for devices that operate in multiple frequency bands while using the same transmit antenna, the highest gain of the antenna within the operating band nearest in frequency to the restricted band emission being measured may be used in lieu of the overall highest gain when the emission is at a frequency that is within 20 percent of the nearest band edge frequency, but in no case shall a value less than 2 dBi be used.
12). Compare the resultant electric field strength level to the applicable regulatory limit.
13). Perform radiated spurious emission test duress until all measured frequencies were complete.

Test Setup Layout



EUT Operation during Test

The EUT was programmed to be in continuously transmitting mode.

Test result

PASS

Please refer to Appendix B.7

Remark:

Remark:
1). Test results including cable loss;
2). "---"means that the fundamental frequency not for 15.209 limits requirement;
3). The average measurement was not performed when the peak measured data under the limit of average detection.
4). Detector AV is setting spectrum/receiver. RBW=1MHz/VBW=10Hz/Sweep time=Auto/Detector =Peak.
5). Since the out-of-band characteristics of the EUT transmit antenna will often be unknown, the use of a conservative antenna gain value is necessary. Thus, when determining the EIRP based on the

measured conducted power, the upper bound on antenna gain for a device with a single RF output shall be selected as the maximum in-band gain of the antenna across all operating bands, or 2 dBi, whichever is greater. However, for devices that operate in multiple frequency bands while using the same transmit antenna, the highest gain of the antenna within the operating band nearest in frequency to the restricted band emission being measured may be used in lieu of the overall highest gain when the emission is at a frequency that is within 20 percent of the nearest band edge frequency, but in no case shall a value less than 2 dBi be used.

6.8 Radiated Emissions Measurement

Standard requirement:

According to FCC §15.247 (d)/section 5.5 of RSS-247: In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device is operating, the RF power that is produced shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under Section 5.4(4), the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen Issue 4 is not required.

In case the emission fall within the restricted band specified on RSS-Gen Issue 4, then the RSS-Gen Issue 4 limit in the table below has to be followed.

Frequencies (MHz)	Field Strength (microvolts/meter)	Measurement Distance (meters)
0.009~0.490	2400/F(KHz)	300
0.490~1.705	24000/F(KHz)	30
1.705~30.0	30	30
30~88	100	3
88~216	150	3
216~960	200	3
Above 960	500	3

Measuring Instruments and Setting:

Please refer to equipment list in this report. The following table is the setting of spectrum analyzer and receiver.

Spectrum Parameter	Setting
Attenuation	Auto
Start Frequency	1000 MHz
Stop Frequency	10th carrier harmonic
RB / VB (Emission in restricted band)	1MHz / 1MHz for Peak, 1 MHz / 1/B kHz for Average
RB / VB (Emission in non-restricted band)	1MHz / 1MHz for Peak, 1 MHz / 1/B kHz for Average

Receiver Parameter	Setting
Attenuation	Auto
Start ~ Stop Frequency	9kHz~150kHz / RB/VB 200Hz/1KHz for QP/AVG
Start ~ Stop Frequency	150kHz~30MHz / RB/VB 9kHz/30KHz for QP/AVG
Start ~ Stop Frequency	30MHz~1000MHz / RB/VB 120kHz/1MHz for QP

Test Procedures

1) Sequence of testing 9 kHz to 30 MHz

Setup:

--- The equipment was set up to simulate a typical usage like described in the user manual or described by manufacturer.

--- If the EUT is a tabletop system, a rotatable table with 0.8 m height is used.

--- If the EUT is a floor standing device, it is placed on the ground.

--- Auxiliary equipment and cables were positioned to simulate normal operation conditions.

--- The AC power port of the EUT (if available) is connected to a power outlet below the turntable.

--- The measurement distance is 3 meter.

--- The EUT was set into operation.

Premeasurement:

--- The turntable rotates from 0° to 315° using 45° steps.

--- The antenna height is 1.5 meter.

--- At each turntable position the analyzer sweeps with peak detection to find the maximum of all emissions

Final measurement:

--- Identified emissions during the premeasurement the software maximizes by rotating the turntable position (0° to 360°) and by rotating the elevation axes (0° to 360°).

--- The final measurement will be done in the position (turntable and elevation) causing the highest emissions with QPK detector.

--- The final levels, frequency, measuring time, bandwidth, turntable position, correction factor, margin to the limit and limit will be recorded. Also a plot with the graph of the premeasurement and the limit will be stored.

2) Sequence of testing 30 MHz to 1 GHz

Setup:

--- The equipment was set up to simulate a typical usage like described in the user manual or described by manufacturer.

--- If the EUT is a tabletop system, a table with 0.8 m height is used, which is placed on the ground plane.

--- If the EUT is a floor standing device, it is placed on the ground plane with insulation between both.

--- Auxiliary equipment and cables were positioned to simulate normal operation conditions

--- The AC power port of the EUT (if available) is connected to a power outlet below the turntable.

--- The measurement distance is 3 meter.

--- The EUT was set into operation.

Premeasurement:

--- The turntable rotates from 0° to 315° using 45° steps.

--- The antenna is polarized vertical and horizontal.

--- The antenna height changes from 1 to 3 meter.

--- At each turntable position, antenna polarization and height the analyzer sweeps three times in peak to find the maximum of all emissions.

Final measurement:

--- The final measurement will be performed with minimum the six highest peaks.

--- According to the maximum antenna and turntable positions of premeasurement the software maximize the peaks by changing turntable position (± 45°) and antenna movement between 1 and 4 meter.

--- The final measurement will be done with QP detector with an EMI receiver.

--- The final levels, frequency, measuring time, bandwidth, antenna height, antenna polarization, turntable angle, correction factor, margin to the limit and limit will be recorded. Also a plot with the graph of the premeasurement with marked maximum final measurements and the limit will be stored.

3) Sequence of testing 1 GHz to 18 GHz

Setup:

--- The equipment was set up to simulate a typical usage like described in the user manual or described by manufacturer.

--- If the EUT is a tabletop system, a rotatable table with 1.5 m height is used.

--- If the EUT is a floor standing device, it is placed on the ground plane with insulation between both.

--- Auxiliary equipment and cables were positioned to simulate normal operation conditions

--- The AC power port of the EUT (if available) is connected to a power outlet below the turntable.

--- The measurement distance is 3 meter.

--- The EUT was set into operation.

Premeasurement:

--- The turntable rotates from 0° to 315° using 45° steps.

--- The antenna is polarized vertical and horizontal.

--- The antenna height scan range is 1 meter to 2.5 meter.

--- At each turntable position and antenna polarization the analyzer sweeps with peak detection to find the maximum of all emissions.

Final measurement:

--- The final measurement will be performed with minimum the six highest peaks.

--- According to the maximum antenna and turntable positions of premeasurement the software maximize the peaks by changing turntable position (± 45°) and antenna movement between 1 and 4 meter. This procedure is repeated for both antenna polarizations.

--- The final measurement will be done in the position (turntable, EUT-table and antenna polarization) causing the highest emissions with Peak and Average detector.

--- The final levels, frequency, measuring time, bandwidth, turntable position, EUT-table position, antenna polarization, correction factor, margin to the limit and limit will be recorded. Also a plot with the graph of the premeasurement with marked maximum final measurements and the limit will be stored.

4) Sequence of testing above 18 GHz

Setup:

--- The equipment was set up to simulate a typical usage like described in the user manual or described by manufacturer.

--- If the EUT is a tabletop system, a rotatable table with 1.5 m height is used.

--- If the EUT is a floor standing device, it is placed on the ground plane with insulation between both.

--- Auxiliary equipment and cables were positioned to simulate normal operation conditions

--- The AC power port of the EUT (if available) is connected to a power outlet below the turntable.

--- The measurement distance is 1 meter.

--- The EUT was set into operation.

Premeasurement:

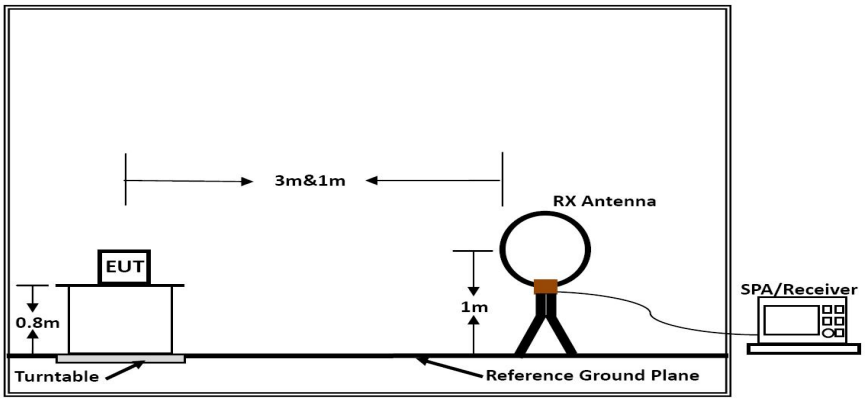
--- The antenna is moved spherical over the EUT in different polarisations of the antenna.

Final measurement:

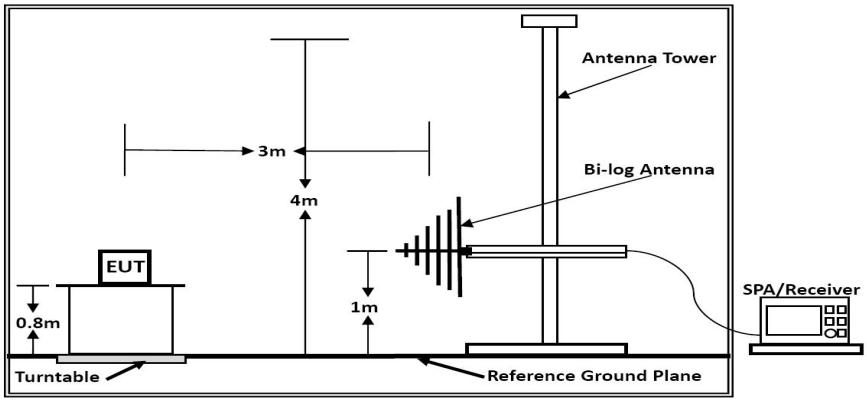
--- The final measurement will be performed at the position and antenna orientation for all detected emissions that were found during the premeasurements with Peak and Average detector.

--- The final levels, frequency, measuring time, bandwidth, correction factor, margin to the limit and limit will be recorded. Also a plot with the graph of the premeasurement and the limit will be stored.

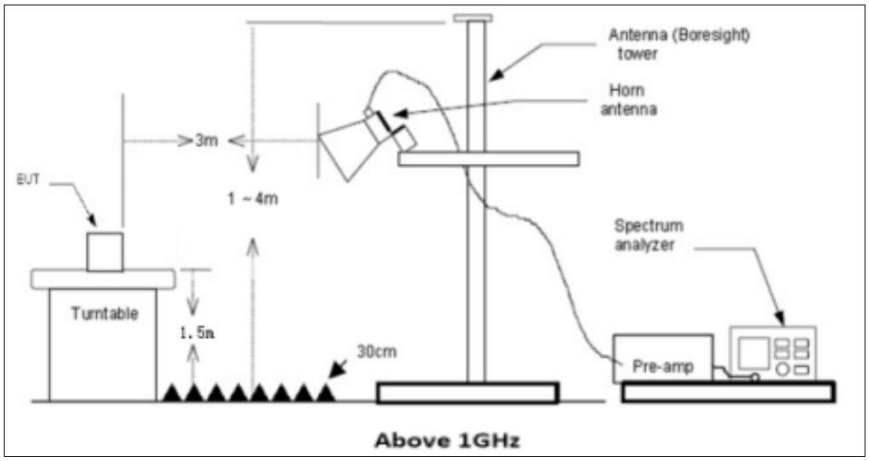
Test Setup Layout



Below 30MHz



Below 1GHz



Above 18 GHz shall be extrapolated to the specified distance using an extrapolation factor of 20 dB/decade form 3m to 1m.

Distance extrapolation factor = 20 log (specific distance [3m] / test distance [1m]) (dB);

Limit line = specific limits (dBuV) + distance extrapolation factor [6 dB].

EUT Operation during Test

The EUT was programmed to be in continuously transmitting mode.

Test result

.

Temperature	25.5℃	Humidity	52.2%
Test Engineer	Emiya Lin	Configurations	BLE

Remarks:

1. Only the worst case Main Antenna test data.
2. Pre-scan all kind of the place mode (X-axis, Y-axis, Z-axis), and found the Y-axis which it is worse case.

■ **Results of Radiated Emissions (9 KHz~30MHz)**

Freq. (MHz)	Level (dBuV)	Over Limit (dB)	Over Limit (dBuV)	Remark
-	-	-	-	See Note

Note:

The emission from 9 kHz to 30MHz was pre-tested and found the result was 20dB lower than the limit, and according to 15.31(o) & RSS-Gen 6.13, the test result no need to reported.

Distance extrapolation factor = 40 log (specific distance / test distance) (dB);
Limit line = specific limits (dBuV) + distance extrapolation factor.

■ **Results of Radiated Emissions (30MHz~1GHz)**

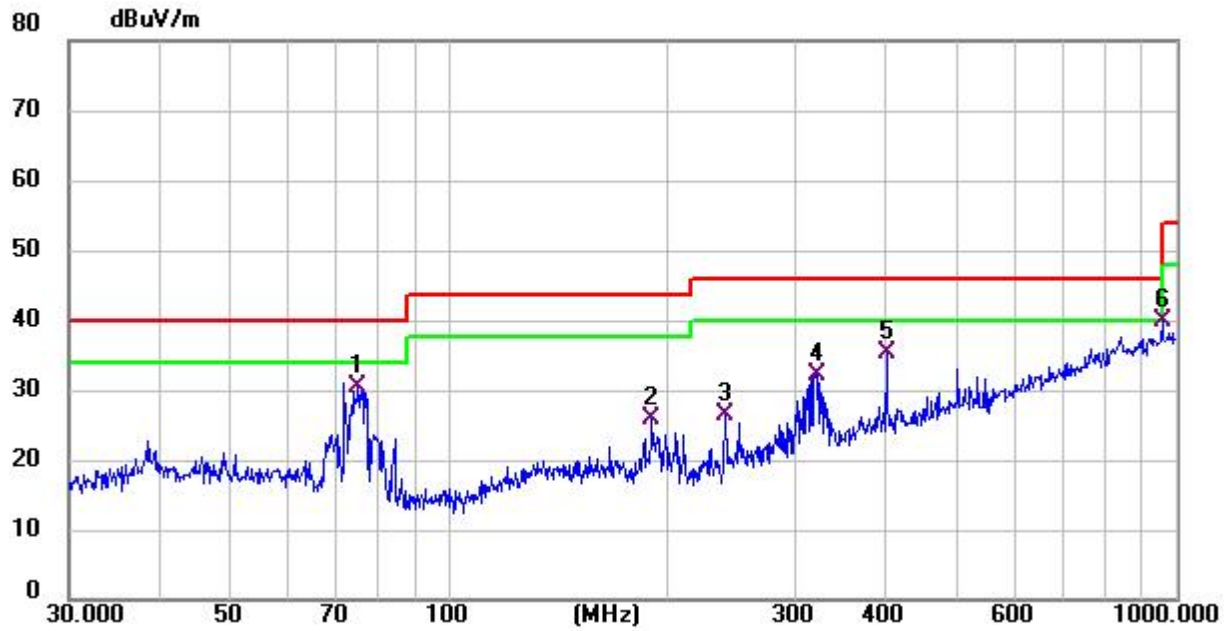
Pre-scan all test modes, found worst case at GFSK (LCH), and so only show the test result of GFSK (LCH).

Model name:	ToughC5	Test Date :	2026-06-29
Polarization :	Vertical	Test Result:	☒ Pass ☐ Fail

Remark: Factor = Antenna Factor + Cable Loss – Pre-amplifier.
Measurement Result=Reading Level +Correct Factor;
Over Limit= Measurement Result- Limit;

No.	Mk.	Freq.	Reading Level	Correct Factor	Measure-ment	Limit	Over	
		MHz	dBuV	dB	dBuV/m	dBuV/m	dB	Detector
1		38.7518	24.66	-0.84	23.82	40.00	-16.18	QP
2		71.8320	34.87	-2.97	31.90	40.00	-8.10	QP
3		180.0165	30.78	-1.54	29.24	43.50	-14.26	QP
4		319.9370	24.25	2.28	26.53	46.00	-19.47	QP
5		400.4319	31.79	4.58	36.37	46.00	-9.63	QP
6	*	824.5968	23.65	14.55	38.20	46.00	-7.80	QP

Model name:	ToughC5	Test Date :	2026-06-29
Polarization :	Horizontal	Test Result:	☒ Pass ☐ Fail



Remark: Factor = Antenna Factor + Cable Loss – Pre-amplifier.
Measurement Result=Reading Level +Correct Factor;
Over Limit= Measurement Result- Limit;

No.	Mk.	Freq.	Reading Level	Correct Factor	Measure-ment	Limit	Over	
		MHz	dBuV	dB	dBuV/m	dBuV/m	dB	Detector
1		74.9191	33.85	-3.32	30.53	40.00	-9.47	QP
2		190.4050	28.35	-2.49	25.86	43.50	-17.64	QP
3		239.9874	26.87	-0.50	26.37	46.00	-19.63	QP
4		321.0608	29.88	2.31	32.19	46.00	-13.81	QP
5		400.4319	30.80	4.58	35.38	46.00	-10.62	QP
6	*	958.7943	23.81	15.99	39.80	46.00	-6.20	QP

Results for Radiated Emissions (1- 26 GHz)

Note: All modes have been tested. 1Mbps is the worst mode, and the report only records the worst data.

Test channel:	Lowest channel

H

Frequency (MHz)	Meter Reading (dBμV)	Factor (dB/m)	Emission Level (dBμV/m)	Limits (dBμV/m)	Margin (dB)	Detector Type
4804.000	47.45	5.06	52.51	74.00	-21.49	PEAK
4804.000	37.20	5.06	42.26	54.00	-11.74	AVG
7206.000	41.15	7.03	48.18	74.00	-25.82	PEAK
7206.000	30.74	7.03	37.77	54.00	-16.23	AVG

V

Frequency (MHz)	Meter Reading (dBμV)	Factor (dB/m)	Emission Level (dBμV/m)	Limits (dBμV/m)	Margin (dB)	Detector Type
4804.000	45.09	5.06	50.15	74.00	-23.85	PEAK
4804.000	35.64	5.06	40.70	54.00	-13.30	AVG
7206.000	41.86	7.03	48.89	74.00	-25.11	PEAK
7206.000	30.34	7.03	37.37	54.00	-16.63	AVG

Test channel:	Middle channel

H

Frequency (MHz)	Meter Reading (dBμV)	Factor (dB/m)	Emission Level (dBμV/m)	Limits (dBμV/m)	Margin (dB)	Detector Type
4880.000	47.26	5.14	52.40	74.00	-21.60	PEAK
4880.000	35.54	5.14	40.68	54.00	-13.32	AVG
7320.000	40.11	7.52	47.63	74.00	-26.37	PEAK
7320.000	30.67	7.52	38.19	54.00	-15.81	AVG

V

Frequency (MHz)	Meter Reading (dBμV)	Factor (dB/m)	Emission Level (dBμV/m)	Limits (dBμV/m)	Margin (dB)	Detector Type
4882.000	45.06	5.14	50.20	74.00	-23.80	PEAK
4882.000	35.67	5.14	40.81	54.00	-13.19	AVG
7323.000	40.56	7.52	48.08	74.00	-25.92	PEAK
7323.000	31.51	7.52	39.03	54.00	-14.97	AVG

Test channel:	Highest channel

H

Frequency (MHz)	Meter Reading (dBμV)	Factor (dB/m)	Emission Level (dBμV/m)	Limits (dBμV/m)	Margin (dB)	Detector Type
4960.000	47.21	5.22	52.43	74.00	-21.57	PEAK
4960.000	35.13	5.22	40.35	54.00	-13.65	AVG
7440.000	40.23	8.06	48.29	74.00	-25.71	PEAK
7440.000	30.11	8.06	38.17	54.00	-15.83	AVG

V

Frequency (MHz)	Meter Reading (dBμV)	Factor (dB/m)	Emission Level (dBμV/m)	Limits (dBμV/m)	Margin (dB)	Detector Type
4960.000	44.93	5.22	50.15	74.00	44.93	PEAK
4960.000	37.31	5.22	42.53	54.00	37.31	AVG
7440.000	41.62	8.06	49.68	74.00	41.62	PEAK
7440.000	44.93	5.22	50.15	74.00	44.93	AVG

Notes:
1). Measuring frequencies from 9 KHz - 10th harmonic or 26.5GHz (which is less), No emission found between lowest internal used/generated frequency to 30MHz.
2). Radiated emissions measured in frequency range from 9 KHz~10th harmonic or 26.5GHz (which is less) were made with an instrument using Peak detector mode.
3). Data of measurement within this frequency range shown “---” in the table above means the reading of emissions are attenuated more than 20dB below the permissible limits or the field strength is too small to be measured.
4). Margin= Final Level – Limit
5).Final Level =Receiver Read level + Antenna Factor + Cable Loss – Preamplifier Factor
6). All the modes have been tested and the only shows the worst case GFSK mode

6.9 Conducted Emissions

Standard requirement:

According to FCC§15.207 (a)/ RSS-Gen Issue 5: For an intentional radiator which is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies within the band 150 kHz to 30 MHz shall not exceed 250 microvolts (The limit decreases linearly with the logarithm of the frequency in the range 0.15 MHz to 0.50 MHz). The limits at specific frequency range is listed as follows:

Frequency Range (MHz)	Limits (dBμV)	
	Quasi-peak	Average
0.15 to 0.50	66 to 56	56 to 46
0.50 to 5	56	46
5 to 30	60	50

* Decreasing linearly with the logarithm of the frequency

Measuring Instruments and Setting:

Please refer to equipment list in this report. The following table is the setting of the spectrum analyzer.

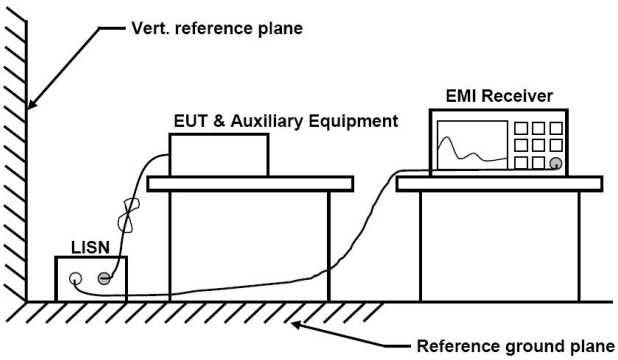
Spectrum Parameter	Setting
Detector	Peak
Attenuation	Auto
RB / VB (Emission in restricted band)	9KHz/30KHz
RB / VB (Emission in non-restricted band)	9KHz/30KHz

Test Procedures

The transmitter output is connected to EMI receiver. The resolution bandwidth is set to 9 kHz. The video bandwidth is set to 30 kHz, Sweep time=Auto

The spectrum from 150 kHz to 30MHz is investigated with the transmitter set to the lowest, middle, and highest channels.

Test Setup Layout



EUT Operation during Test

The EUT was programmed to be in continuously transmitting mode.

Test result

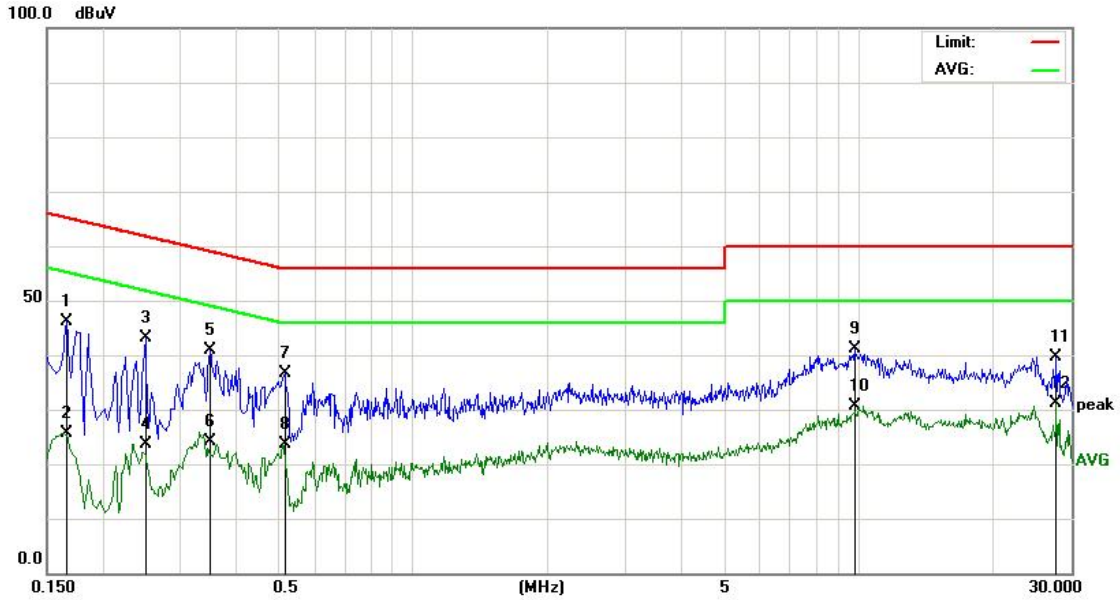
PASS

The test data please refer to following page.

Measurement data:

Pre-scan all test modes, found worst case at GFSK (LCH), and so only show the test result of GFSK (LCH).

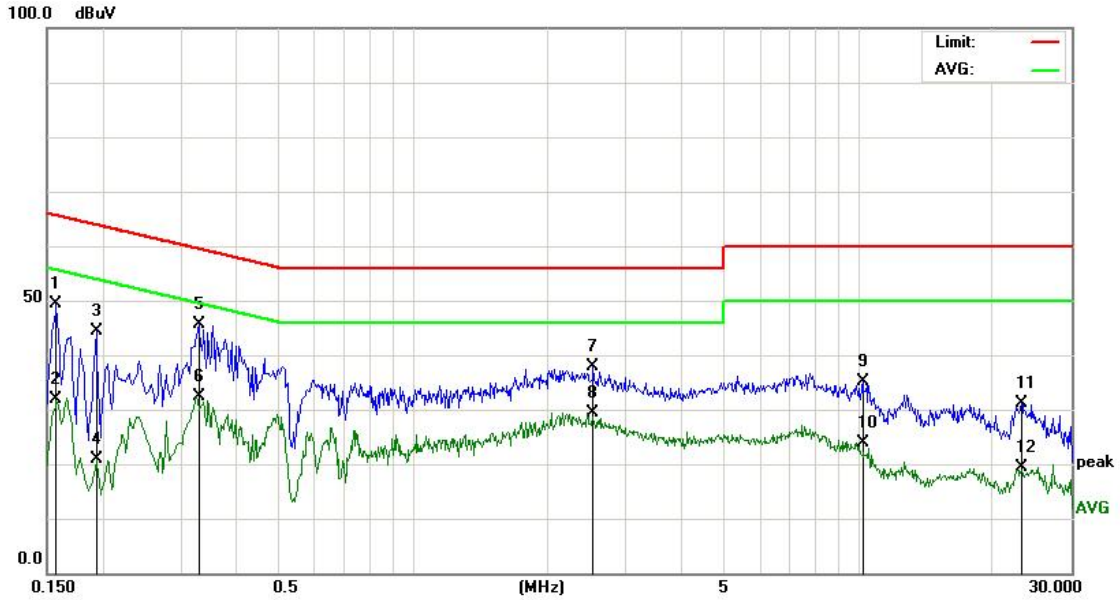
Model name:	ToughC5	Test Date :	2026-06-29
ATM Pressure:	101 kPa	Test by:	Emiya Lin
Phase :	Line	Test Result:	☒ Pass ☐ Fail



Remark: Factor =insertion loss of LISN + Cable loss +insertion loss of Pulse Limiter +insertion loss of Switch.
Measurement Result=Reading Level +Correct Factor;
Over Limit= Measurement Result- Limit;

No.	Mk.	Freq.	Reading Level	Correct Factor	Measure-ment	Limit	Over	
		MHz	dBuV	dB	dBuV	dBuV	dB	Detector
1		0.1660	35.74	10.42	46.16	65.15	-18.99	QP
2		0.1660	15.21	10.42	25.63	55.15	-29.52	AVG
3		0.2500	32.72	10.30	43.02	61.75	-18.73	QP
4		0.2500	13.25	10.30	23.55	51.75	-28.20	AVG
5	*	0.3500	30.54	10.40	40.94	58.96	-18.02	QP
6		0.3500	13.63	10.40	24.03	48.96	-24.93	AVG
7		0.5140	26.15	10.47	36.62	56.00	-19.38	QP
8		0.5140	13.08	10.47	23.55	46.00	-22.45	AVG
9		9.7820	29.16	12.03	41.19	60.00	-18.81	QP
10		9.7820	18.67	12.03	30.70	50.00	-19.30	AVG
11		27.7500	25.01	14.68	39.69	60.00	-20.31	QP
12		27.7500	16.43	14.68	31.11	50.00	-18.89	AVG

Model name:	ToughC5	Test Date :	2026-06-29
ATM Pressure:	101 kPa	Test by:	Emiya Lin
Phase :	Neutral	Test Result:	☒ Pass ☐ Fail



Remark: Factor =insertion loss of LISN + Cable loss +insertion loss of Pulse Limiter +insertion loss of Switch.
Measurement Result=Reading Level +Correct Factor;
Over Limit= Measurement Result- Limit;

No.	Mk.	Freq.	Reading Level	Correct Factor	Measure-ment	Limit	Over	
		MHz	dBuV	dB	dBuV	dBuV	dB	Detector
1		0.1580	38.91	10.43	49.34	65.56	-16.22	QP
2		0.1580	21.57	10.43	32.00	55.56	-23.56	AVG
3		0.1940	33.89	10.40	44.29	63.86	-19.57	QP
4		0.1940	10.36	10.40	20.76	53.86	-33.10	AVG
5	*	0.3300	35.31	10.38	45.69	59.45	-13.76	QP
6		0.3300	21.89	10.38	32.27	49.45	-17.18	AVG
7		2.5340	26.55	11.21	37.76	56.00	-18.24	QP
8		2.5340	18.05	11.21	29.26	46.00	-16.74	AVG
9		10.2060	23.07	12.07	35.14	60.00	-24.86	QP
10		10.2060	11.79	12.07	23.86	50.00	-26.14	AVG
11		23.1580	17.36	13.88	31.24	60.00	-28.76	QP
12		23.1580	5.51	13.88	19.39	50.00	-30.61	AVG

Notes:

1. An initial pre-scan was performed on the line and neutral lines with peak detector.
2. Quasi-Peak and Average measurement were performed at the frequencies with maximized peak emission.
3. Final Level =Receiver Read level + LISN Factor + Cable Loss
4. If the average limit is met when using a quasi-peak detector receiver, the EUT shall be deemed to meet both limits and measurement with the average detector receiver is unnecessary.

7 Test Setup Photographs of EUT

Please refer to separated files for Test Setup Photos of the EUT.

8 External Photographs of EUT

Please refer to separated files for External Photos of the EUT.

9 Internal Photographs of EUT

Please refer to separated files for Internal Photos of the EUT.

------End------