

Test Report

REP153745

Date of issue: March 5, 2026

Applicant: Sensor ID Srl

Product: Handheld RFID reader

Model: U35 BTW 11

Contains

FCC ID: 2AVDNU35BTW11

FCC ID: 2ACTZ-ESP32WROOM32E

FCC ID: UVECAENRFID034

Specifications:

- ◆ **FCC 47 CFR Part 27**
Miscellaneous wireless communications services (Partial testing)
- ◆ **CFR 47 §15.247**
Operation in the 902–928 MHz, 2400–2483.5 MHz, and 5725–5850 MHz (Partial testing)

Test location

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Tested by	Daniele Guarnone
Test engineer signature	 Firmato digitalmente da Guarnone Daniele
Reviewed by	Paolo Barbieri
Reviewer signature	 Firmato digitalmente da Barbieri Paolo

Limits of responsibility

Note that the results contained in this report relate only to the items tested and were obtained in the period between the date of initial receipt of samples and the date of issue of the report.

This test report has been completed in accordance with the requirements of ISO/IEC 17025. All results contain in this report are within Nemko S.p.A. ISO/IEC 17025 accreditation.

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Section 1. Report summary

1.1 Applicant and manufacturer

Company name	Sensor ID Srl
Address	Via Don G.Mucciardi, 5
City	Campochiaro,
Province/State	Campobasso
Postal/Zip code	86020
Country	Italy

1.2 Test specifications

FCC 47 CFR Part 15, Subpart C, Clause 15.247	Operation in the 902–928 MHz, 2400–2483.5 MHz, and 5725–585 MHz
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1.3 Test methods

558074 D01 DTS Meas Guidance v05r02 (April 2, 2019)	Guidance for compliance measurements on digital transmission system, frequency hopping spread spectrum system, and hybrid system devices operating under section 15.247 of the FCC rules
DA 00-705, Released March 30, 2000	Filing and Measurement Guidelines for Frequency Hopping Spread Spectrum Systems
ANSI C63.10 v2020	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices

1.4 Statement of compliance

In the configuration tested, the EUT was found compliant.

Testing was completed against all relevant requirements of the test standard. Results obtained indicate that the product under test complies in full with the requirements tested. The test results relate only to the items tested.

See “Summary of test results” for full details.

1.5 Exclusions

None

1.6 Test report revision history

Revision #	Details of changes made to test report
REP153745	Original report issued

Section 2. Summary of test results

2.1 FCC Part 15 Subpart C, general requirements test results

Part	Test description	Verdict
§15.207(a)	Conducted limits	Not tested
§15.31(e)	Variation of power source	Not tested ¹
§15.203	Antenna requirement	Pass ²

Notes: ¹ Measurements of the variation of the input power or the radiated signal level of the fundamental frequency component of the emission, as appropriate, was performed with the supply voltage varied between 85 % and 115 % of the nominal rated supply voltage. No noticeable output power variation was observed

² The Antennas are located within the enclosure of EUT and not user accessible.

2.2 FCC Part 15 Subpart C, intentional radiators test results

Part	Test description	Verdict
§15.247(a)(1)(i)	Frequency hopping systems operating in the 902–928 MHz band	Not tested
§15.247(a)(1)(ii)	Frequency hopping systems operating in the 5725–5850 MHz band	Not applicable
§15.247(a)(1)(iii)	Frequency hopping systems operating in the 2400–2483.5 MHz band	Not applicable
§15.247(a)(2)	Minimum 6 dB bandwidth for systems using digital modulation techniques	Not tested
§15.247(b)(1)	Maximum peak output power of frequency hopping systems operating in the 2400–2483.5 MHz band and 5725–5850 MHz band	Not tested
§15.247(b)(2)	Maximum peak output power of Frequency hopping systems operating in the 902–928 MHz band	Not tested
§15.247(b)(3)	Maximum peak output power of systems using digital modulation in the 902–928 MHz, 2400–2483.5 MHz, and 5725–5850 MHz bands	Not tested
§15.247(c)(1)	Fixed point-to-point operation with directional antenna gains greater than 6 dBi	Not applicable
§15.247(c)(2)	Transmitters operating in the 2400–2483.5 MHz band that emit multiple directional beams	Not applicable
§15.247(d)	Spurious emissions	Pass
§15.247(e)	Power spectral density for digitally modulated devices	Not tested
§15.247(f)	Time of occupancy for hybrid systems	Not applicable

Section 3. Equipment under test (EUT) details

3.1 Sample information

Receipt date	March 4, 2026
Nemko sample ID number	PRJ0097670001

3.2 EUT information

Product name	Handheld RFID reader
Model	U35 BTW 11
Model variant	--
Serial number	26000016

3.3 Technical information

U35 BTW 11 contains:

1) RFID Module: R7100C LEPTON 7 CAEN with internal antenna, type Quad, Gain 0.7 dBi

Frequency Range: 902÷928 MHz FCC ID: UVECAENRFID034.

2) BLE 5.0: Radio Module U35BTW11 with integral chip antenna (1 dBi)

Frequency Range: 2402.0-2480.0 MHz FCC ID: 2AVDNU35BTW11

3) WIFI-BT-BLE Module: ESP32 WROOM-32E with integral PCB antenna

Frequency Range: 2402.0-2480.0 MHz; 2412.0-2462.0 MHz FCC ID: 2ACTZ-ESP32WROOM32E

3.4 Product description and theory of operation

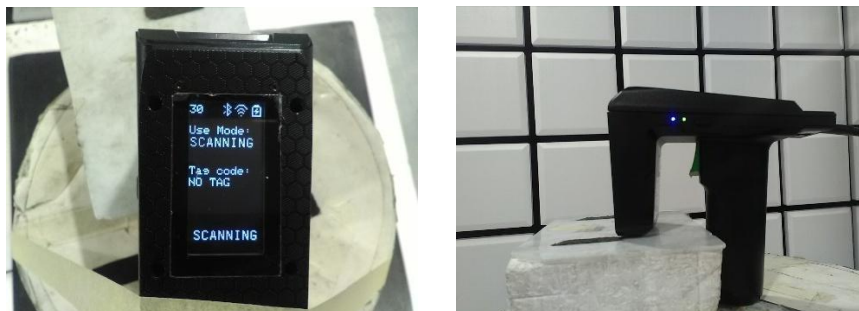
U35 BTW 11 reader is a customized RFID and barcode reader customized according to Smart Retail Operation (RFeyeD) EssilorLuxottica project based on Sensor ID RFID UHF Reader.

Scrolling the menu with buttons 2 and 3 it's possible to select one of the following operating modes:

- Scanning;
- Inventory;
- Find;
- Barcode;
- Radar;
- Write;
- Info;

3.5 EUT exercise details

RFID module in transmission at maximum power (30 dBm), WiFi connected to router Tenda and transmitting on channel 8 (2447 MHz), BT paired to tablet by means app Simplicity Connect



3.6 EUT setup diagram

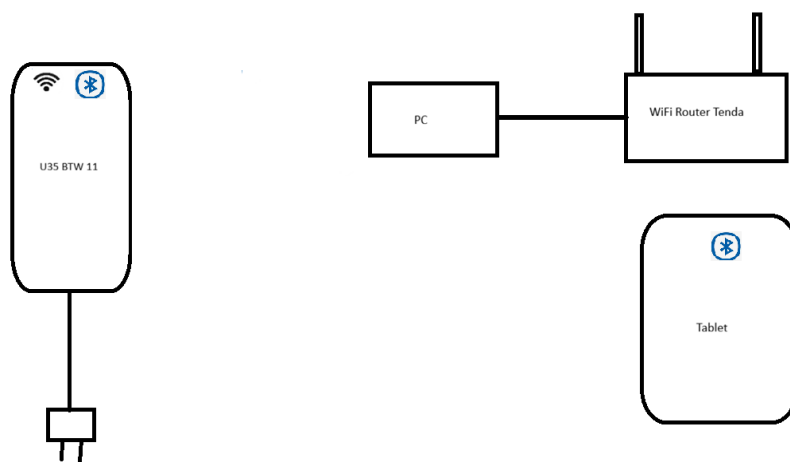


Figure 3.6-1: Setup diagram

3.7 EUT sub assemblies

Table 3.7-1: EUT sub assemblies

Description	Brand name	Model/Part number	Serial number
RFID reader	Sensor ID	UT35 BTW11	26000016
AD/DC adapter		TS-A005050100E6	POSC05100A-USB

Section 4. Engineering considerations

4.1 Modifications incorporated in the EUT

There were no modifications performed to the EUT during this assessment.

4.2 Technical judgment

None

4.3 Deviations from laboratory tests procedures

No deviations were made from laboratory procedures.

Section 5. Test conditions

5.1 Atmospheric conditions

Temperature	18–33 °C
Relative humidity	20–70 %
Air pressure	860–1060 mbar

When it is impracticable to carry out tests under these conditions, a note to this effect stating the ambient temperature and relative humidity during the tests shall be recorded and stated.

The following instruments are used to monitor the environmental conditions:

Equipment	Manufacturer	Model no.	Asset no.	Cal cycle	Next cal.
Thermo-hygrometer	Testo	175-H2	20013013/305	01/2025	01/2027
Thermo-hygrometer	Testo	175-H2	20012380/305	01/2025	01/2027
Barometer	Castle	GPB 3300	072015	03/2025	03/2026

5.2 Power supply range

The normal test voltage for equipment to be connected to the mains shall be the nominal mains voltage. For the purpose of the present document, the nominal voltage shall be the declared voltage, or any of the declared voltages $\pm 5\%$, for which the equipment was designed.

Section 6. Measurement uncertainty

6.1 Uncertainty of measurement

The measurement uncertainty was calculated for each test and quantity listed in this test report, according to CISPR 16-4-2, ETSI TR 100 028-1, ETSI TR 100 028-2 and other specific test standards and is documented in Nemko Spa working manuals WML1002 and WML0078.

The assessment of conformity for each test performed on the equipment is performed not taking into account the measurement uncertainty. The two following possible verdicts are stated in the report:

P (Pass) - The measured values of the equipment respect the specification limit at the points tested. The specific risk of false accept is up to 50% when the measured result is close to the limit.

F (Fail) - One or more measured values of the equipment do not respect the specification limit at the points tested. The specific risk of false reject is up to 50% when the measured result is close to the limit.

Hereafter Nemko's measurement uncertainties are reported:

EUT	Type	Test	Range	Measurement Uncertainty	Notes
Transmitter	Conducted	Frequency error	0.001 MHz ÷ 40 GHz	0.08 ppm	(1)
		Carrier power RF Output Power	0.009 MHz ÷ 30 MHz	1.1 dB	(1)
			30 MHz ÷ 18 GHz	1.5 dB	(1)
			18 MHz ÷ 40 GHz	3.0 dB	(1)
			40 MHz ÷ 140 GHz	5.0 dB	(1)
		Adjacent channel power	1 MHz ÷ 18 GHz	1.4 dB	(1)
		Conducted spurious emissions	0.009 MHz ÷ 18 GHz	3.0 dB	(1)
			18 GHz ÷ 40 GHz	4.2 dB	(1)
			40 GHz ÷ 220 GHz	6.0 dB	(1)
		Intermodulation attenuation	1 MHz ÷ 18 GHz	2.2 dB	(1)
		Attack time – frequency behaviour	1 MHz ÷ 18 GHz	2.0 ms	(1)
		Attack time – power behaviour	1 MHz ÷ 18 GHz	2.5 ms	(1)
		Release time – frequency behaviour	1 MHz ÷ 18 GHz	2.0 ms	(1)
		Release time – power behaviour	1 MHz ÷ 18 GHz	2.5 ms	(1)
		Transient behaviour of the transmitter– Transient frequency behaviour	1 MHz ÷ 18 GHz	0.2 kHz	(1)
		Transient behaviour of the transmitter – Power level slope	1 MHz ÷ 18 GHz	9%	(1)
		Frequency deviation - Maximum permissible frequency deviation	0.001 MHz ÷ 18 GHz	1.3%	(1)
		Frequency deviation - Response of the transmitter to modulation frequencies above 3 kHz	0.001 MHz ÷ 18 GHz	0.5 dB	(1)
		Dwell time	-	3%	(1)
		Hopping Frequency Separation	0.01 MHz ÷ 18 GHz	1%	(1)
		Occupied Channel Bandwidth	0.01 MHz ÷ 18 GHz	2%	(1)
		Modulation Bandwidth	0.01 MHz ÷ 18 GHz	2%	(1)
Receiver	Radiated	Radiated spurious emissions	0.009 MHz ÷ 26.5 GHz	6.0 dB	(1)
			26.5 GHz ÷ 66 GHz	8.0 dB	(1)
			66 GHz ÷ 220 GHz	10 dB	(1)
		Effective radiated power transmitter	10 kHz ÷ 26.5 GHz	6.0 dB	(1)
			26.5 GHz ÷ 66 GHz	8.0 dB	(1)
			66 GHz ÷ 220 GHz	10 dB	(1)
	Radiated	Radiated spurious emissions	0.009 MHz ÷ 26.5 GHz	6.0 dB	(1)
			26.5 GHz ÷ 66 GHz	8.0 dB	(1)
			66 GHz ÷ 220 GHz	10 dB	(1)
		Sensitivity measurement	1 MHz ÷ 18 GHz	6.0 dB	(1)
Receiver	Conducted	Conducted spurious emissions	0.009 MHz ÷ 18 GHz	3.0 dB	(1)
			18 GHz ÷ 40 GHz	4.2 dB	(1)
			40 GHz ÷ 220 GHz	6.0 dB	(1)

NOTES:

(1) The reported expanded uncertainty of measurement is stated as the standard uncertainty of measurement multiplied by the coverage factor $k = 2$, which for a normal distribution corresponds to a coverage probability of approximately 95 %

Section 7. Test equipment

7.1 Test equipment list

Table 7.1-1: Equipment list

Equipment	Manufacturer	Model no.	Asset no.	Cal cycle	Next cal.
EMI Receiver	Rohde & Schwarz	ESW44	101620	08/2025	08/2026
Antenna 1 - 18 GHz	Schwarzbeck Mess-Elektronik	STLP9148	STLP 9148-152	10/2024	10/2027
Double Ridge Horn Antenna	RFSpin	DRH40	061106A40	05/2023	05/2026
Broadband Amplifier	Schwarzbeck Mess-Elektronik	BBV9718C	00121	12/2025	12/2026
Controller	Maturo	FCU3.0	10041	NCR	NCR
Tilt antenna mast	Maturo	TAM4.0-E	10042	NCR	NCR
Turntable	Maturo	TT4.0-5T	2.527	NCR	NCR
3m Semi anechoic chamber	Comtest	SAC-3	1711-150	09/2024	09/2026
Software turntable and mast	Maturo	mcApp	8.1.0.5410	NCR	NCR
Cable set	Rosenberger and Huber + Suhner	RE01+RE02	01/2026	01/2026	01/2027
10m Semi anechoic chamber	Comtest	SAC-10	530	10/2025	10/2027
Cable set	Rosenberger+Huber-Suhner	RE04+RE05	1.511+1.512	01/2026	01/2027
RF Cable 2.92mm, 40GHz, 0.6m	Huber + Suhner	SF550S/11SK/11SK/24in	3223195001	05/2025	05/2026

Note: NCR - no calibration required, VOU - verify on use

Section 8. Testing data

8.1 FCC 15.247(d) Spurious (out-of-band) unwanted emissions

8.1.1 Definitions and limits

FCC:

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)).

Table 8.1-1: FCC §15.209 Radiated emission limits

Frequency, MHz	Field strength of emissions		Measurement distance, m
	$\mu\text{V/m}$	$\text{dB}\mu\text{V/m}$	
0.009–0.490	2400/F	$67.6 - 20 \times \log_{10}(F)$	300
0.490–1.705	24000/F	$87.6 - 20 \times \log_{10}(F)$	30
1.705–30.0	30	29.5	30
30–88	100	40.0	3
88–216	150	43.5	3
216–960	200	46.0	3
above 960	500	54.0	3

Notes: In the emission table above, the tighter limit applies at the band edges.

For frequencies above 1 GHz the limit on peak RF emissions is 20 dB above the maximum permitted average emission limit applicable to the equipment under test

Table 8.1-2: FCC restricted frequency bands

MHz	MHz	MHz	GHz
0.090–0.110	16.42–16.423	399.9–410	4.5–5.15
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	2690–2900	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	3600–4400	Above 38.6
13.36–13.41			

8.1.2 Test summary

Test date	March 5, 2026	Verdict	Pass
Test engineer	Daniele Guarnone	Sample tested	

8.1.3 Observations, settings and special notes

The spectrum was searched from 30 MHz to the 10th harmonic.
EUT was set to transmit with 100 % duty cycle: **RFID, WiFi and BT at maximum power**
Radiated measurements were performed at a distance of 3 m.

Spectrum analyser settings for radiated measurements within restricted bands below 1 GHz:

Resolution bandwidth:	100 kHz
Video bandwidth:	300 kHz
Detector mode:	Peak
Trace mode:	Max Hold

Spectrum analyser settings for peak radiated measurements within restricted bands above 1 GHz:

Resolution bandwidth:	1 MHz
Video bandwidth:	3 MHz
Detector mode:	Peak
Trace mode:	Max Hold

Spectrum analyser settings for average radiated measurements within restricted bands above 1 GHz:

Resolution bandwidth:	1 MHz
Video bandwidth:	10 Hz
Detector mode:	Peak
Trace mode:	Max Hold

Spectrum analyser settings for conducted spurious emissions measurements:

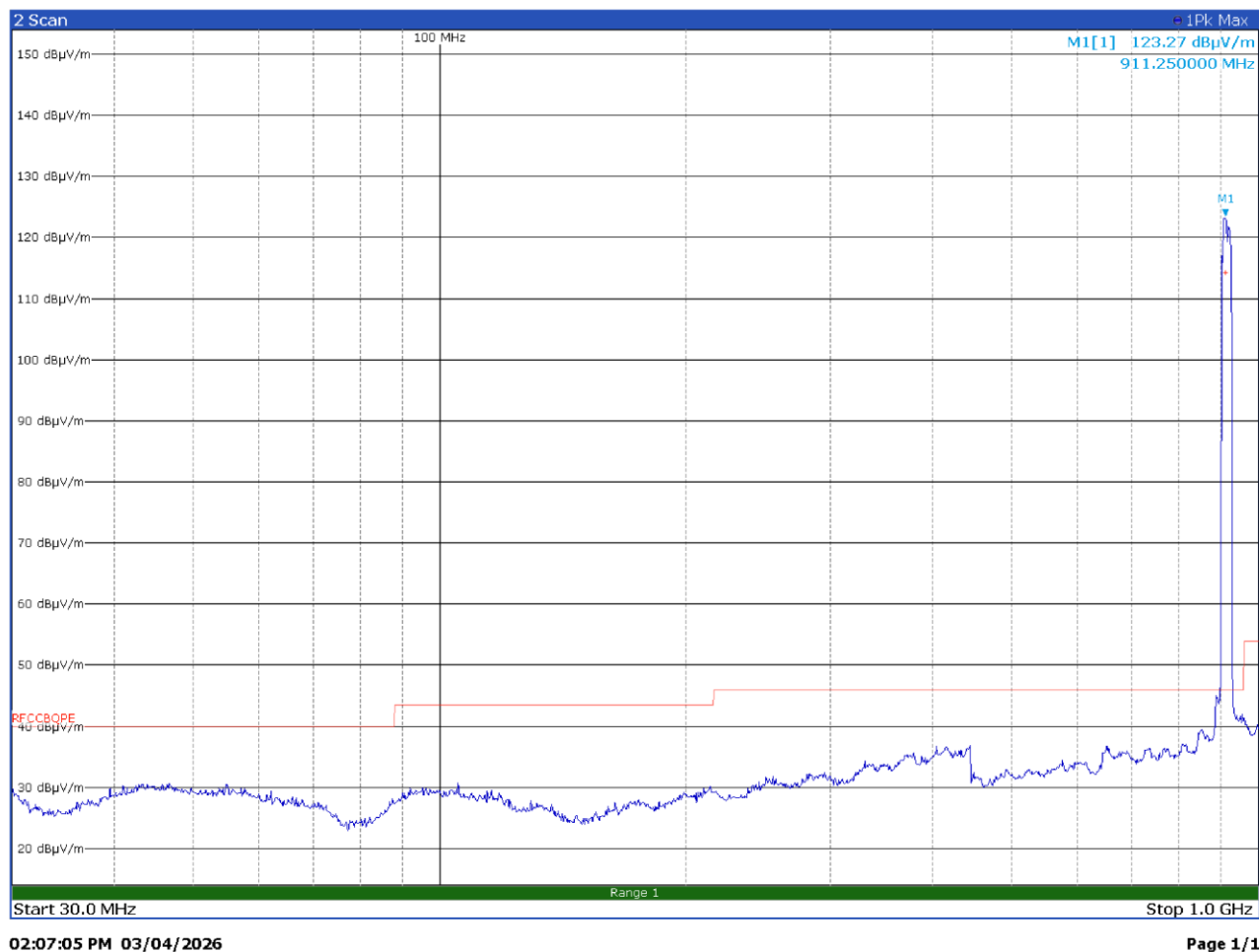
Resolution bandwidth:	100 kHz
Video bandwidth:	300 kHz
Detector mode:	Peak
Trace mode:	Max Hold

8.1.4 Test equipment used

Equipment	Manufacturer	Model no.	Asset no.	Cal cycle	Next cal.
EMI Receiver	Rohde & Schwarz	ESW44	101620	08/2025	08/2026
Antenna 1 - 18 GHz	Schwarzbeck Mess-Elektronik	STLP9148	STLP 9148-152	10/2024	10/2027
Double Ridge Horn Antenna	RFSpin	DRH40	061106A40	05/2023	05/2026
Broadband Amplifier	Schwarzbeck Mess-Elektronik	BBV9718C	00121	12/2025	12/2026
Controller	Maturo	FCU3.0	10041	NCR	NCR
Tilt antenna mast	Maturo	TAM4.0-E	10042	NCR	NCR
Turntable	Maturo	TT4.0-5T	2.527	NCR	NCR
3m Semi anechoic chamber	Comtest	SAC-3	1711-150	09/2024	09/2026
Software turntable and mast	Maturo	mcApp	8.1.0.5410	NCR	NCR
Cable set	Rosenberger and Huber + Suhner	RE01+RE02	01/2026	01/2027	01/2026
10m Semi anechoic chamber	Comtest	SAC-10	530	10/2025	10/2027
Cable set	Rosenberger+Huber-Suhner	RE04+RE05	1.511+1.512	01/2026	01/2027
Cable set	Rosenberger+Huber+Suhner	CE01+CE02	1.498+1.632	01/2026	01/2027
RF Cable 2.92mm, 40GHz, 0.6m	Huber + Suhner	SF550S/11SK/11SK/24in	3223195001	05/2025	05/2026

Note: NCR - no calibration required, VOU - verify on use

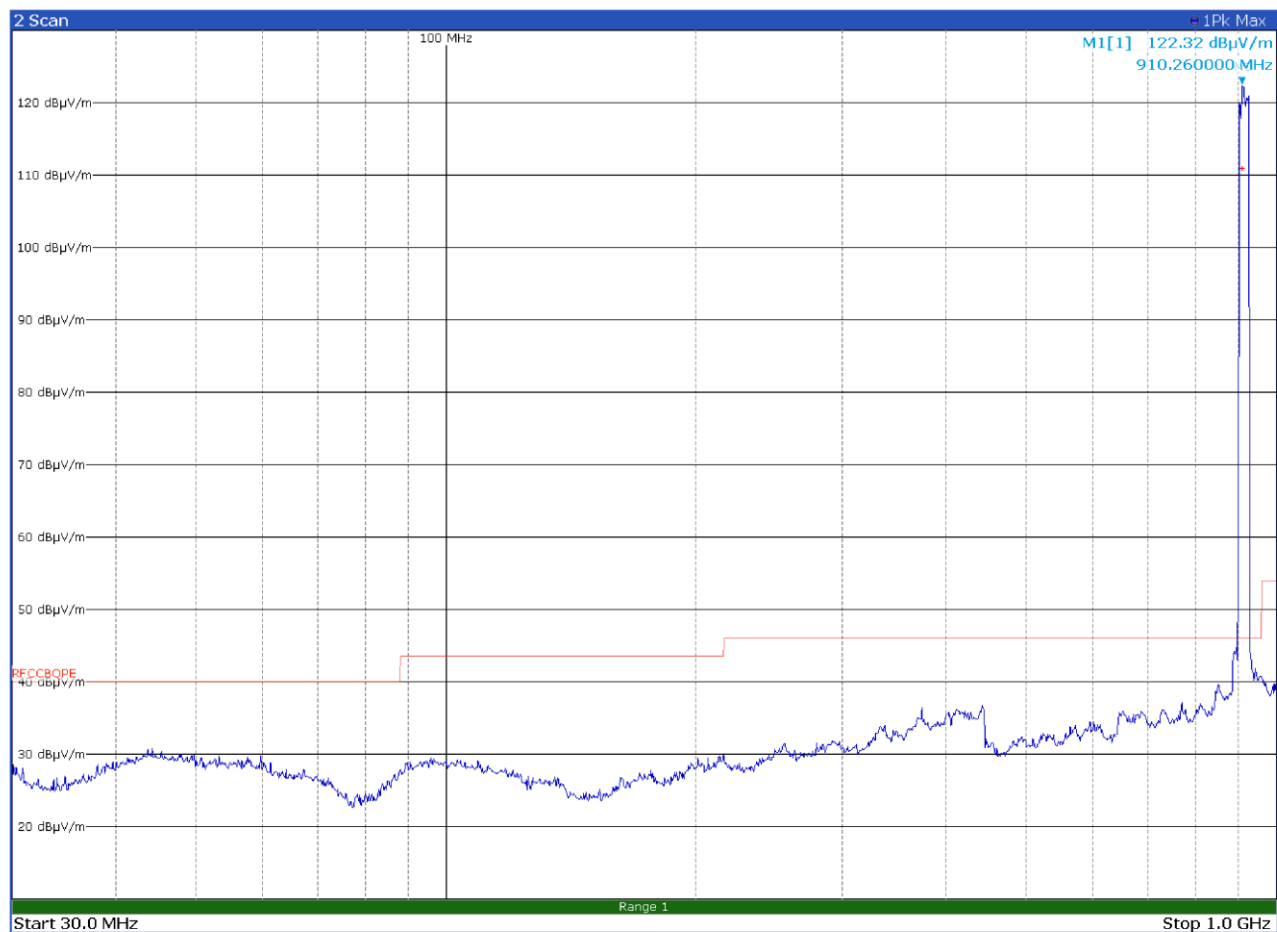
8.1.5 Test data



Frequency (MHz)	Level (dBμV/m)	Level (dBμV/m)	Margin (dB)	Detector
911.2500	123.3	--	--	PK

Limit exceeded by carrier

Figure 8.1-1: Radiated spurious emissions 30 MHz to 1 GHz, vertical polarization



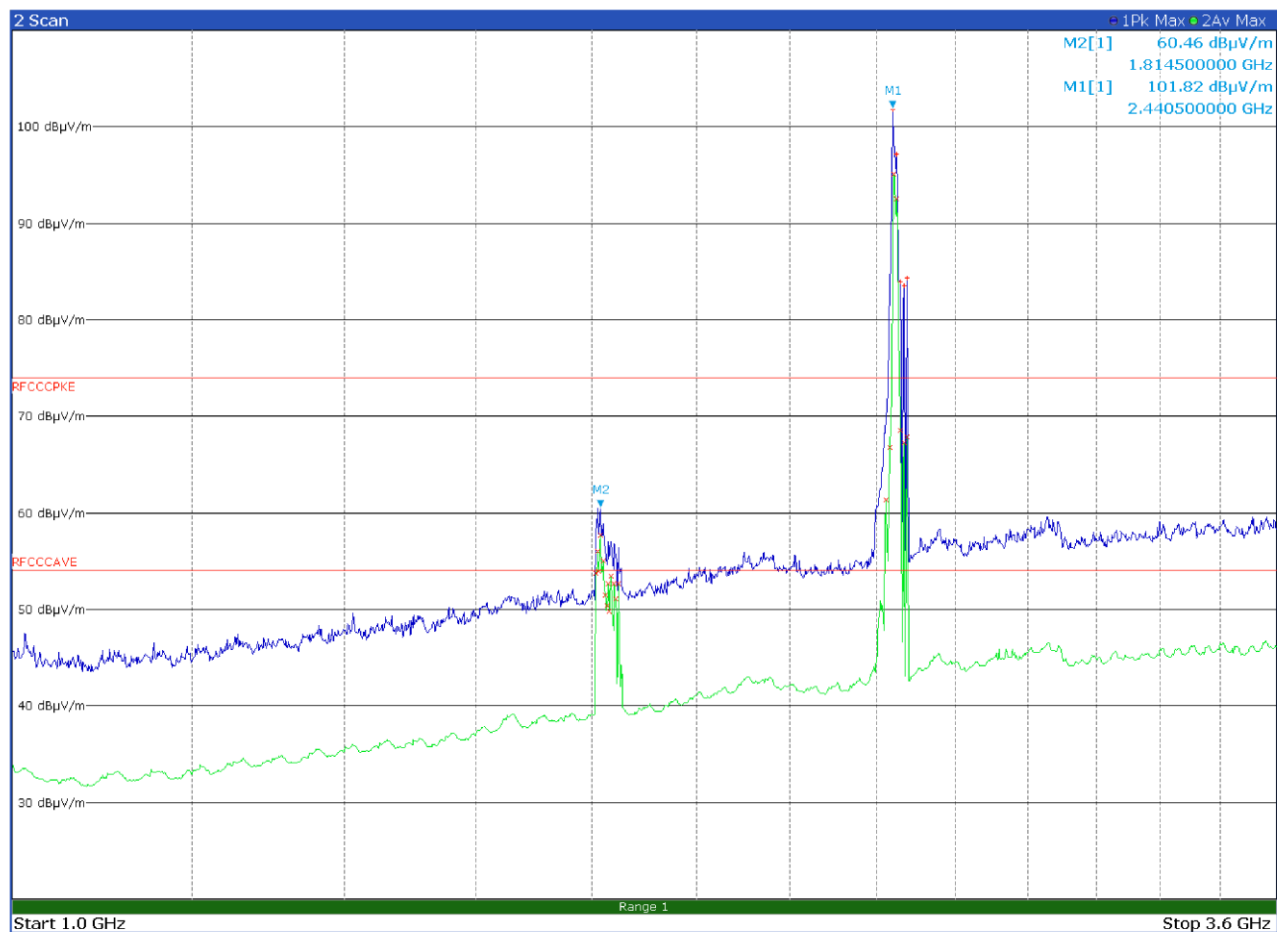
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Frequency (MHz)	Level (dBμV/m)	Level (dBμV/m)	Margin (dB)	Detector
910.2600	122.3	--	--	PK

Limit exceeded by carrier

Figure 8.1-2: Radiated spurious emissions 30 MHz to 1 GHz, horizontal polarization



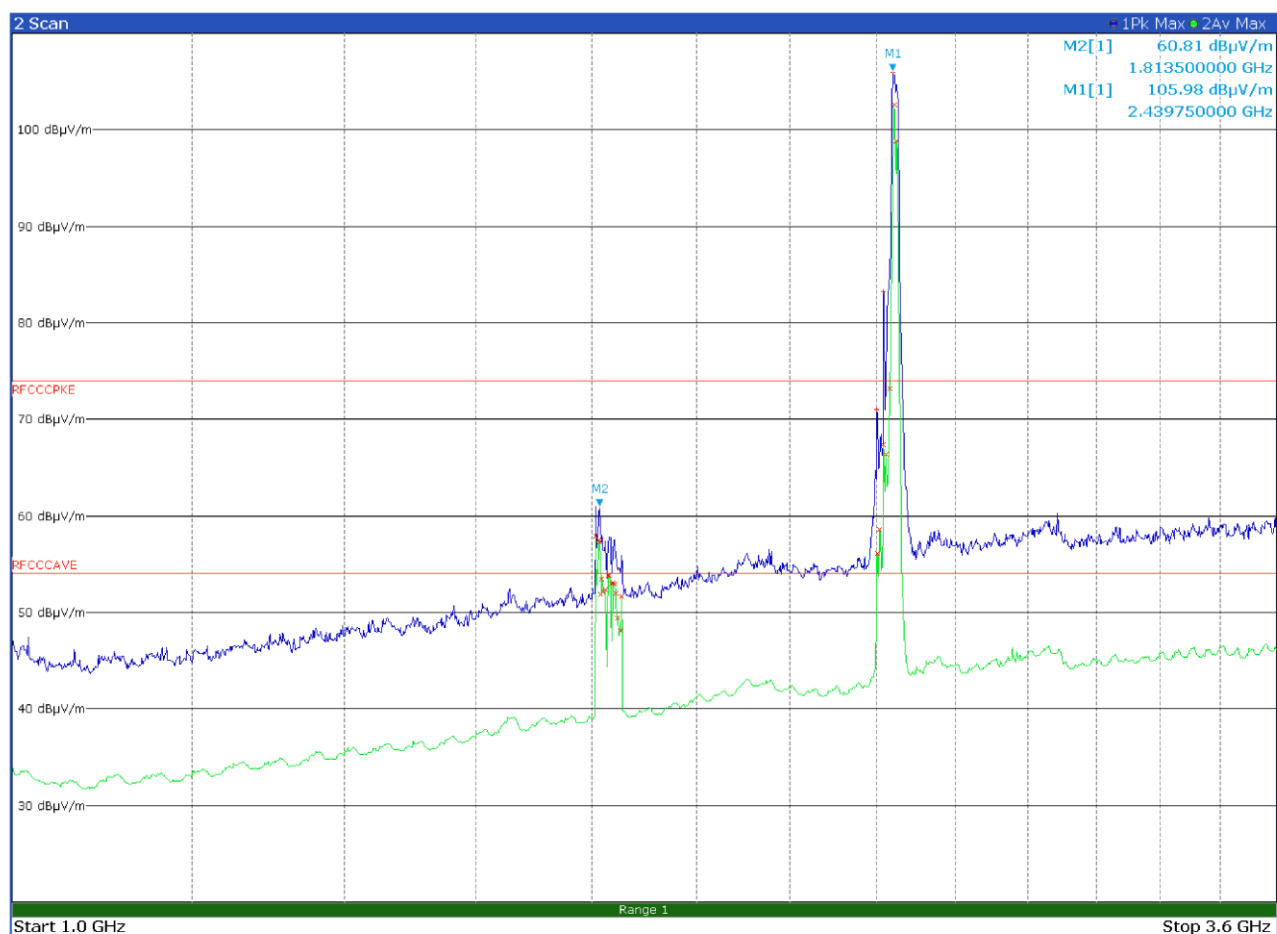
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Frequency (MHz)	Level (dBμV/m)	Level (dBμV/m)	Margin (dB)	Detector
1814.5000	60.5	102.3	-41.8	PK

Limit exceeded by WiFi and Bluetooth carriers

Figure 8.1-3: Radiated spurious emissions 1 GHz to 3.6 GHz, horizontal polarization



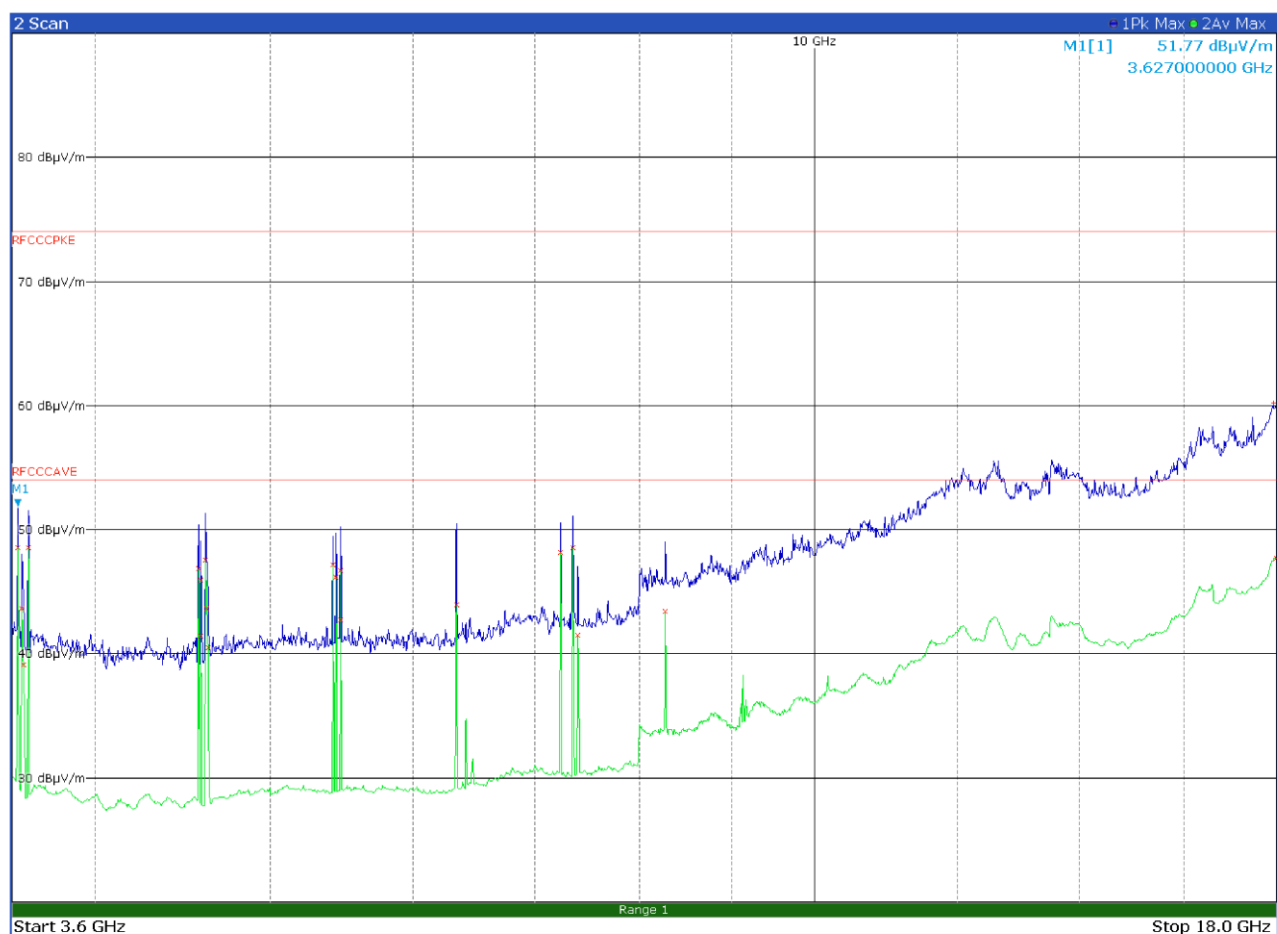
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Frequency (MHz)	Level (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Detector
1813.5000	60.8	103.3	-42.5	Av

Limit exceeded by WiFi and Bluetooth carriers

Figure 8.1-4: Radiated spurious emissions 1 GHz to 3.6 GHz, vertical polarization

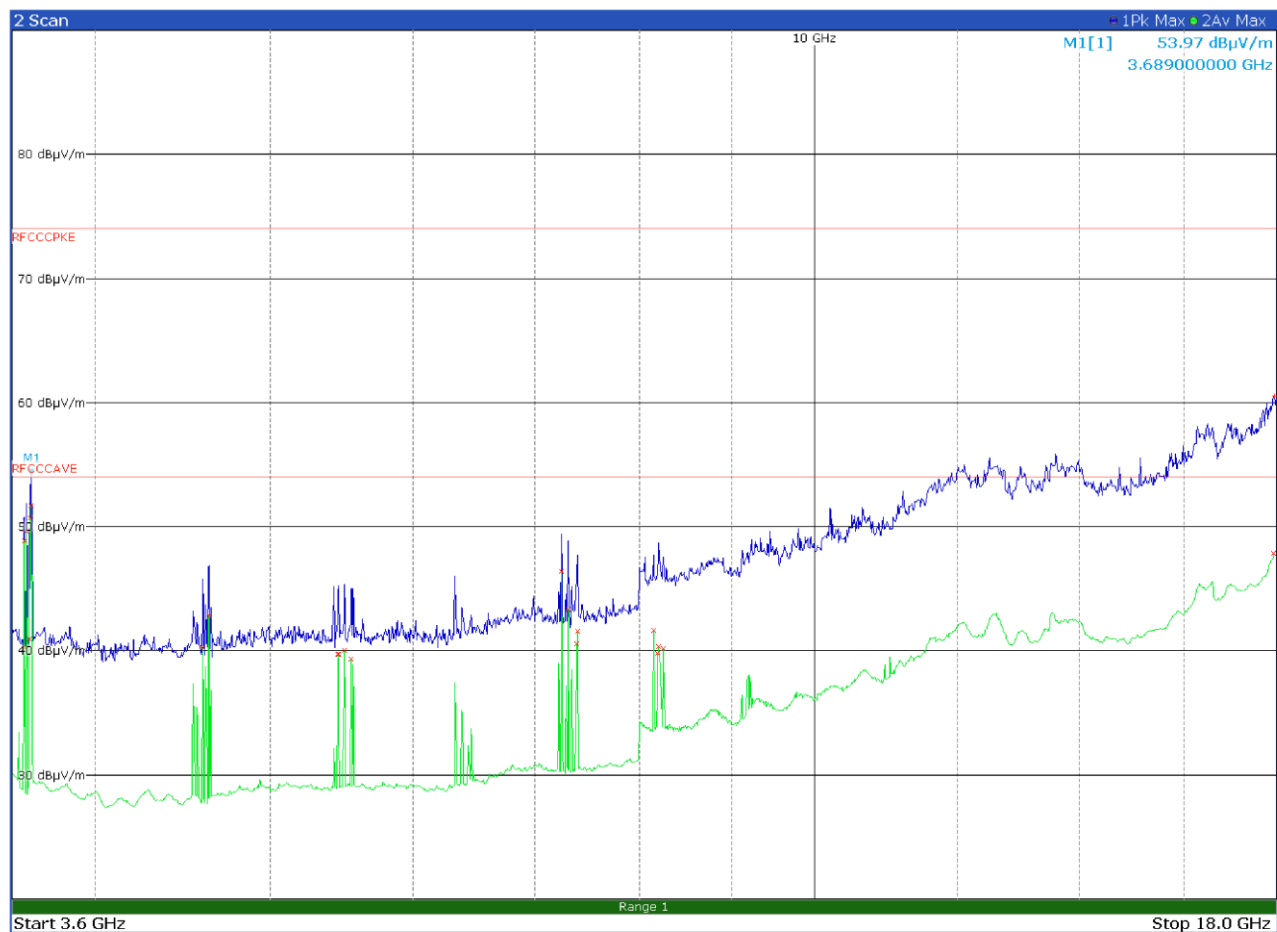


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Frequency (MHz)	Level (dBμV)	Limit (dBμV)	Margin (dB)	Detector
3627.0000	48.6	54.0	-5.4	Av
3645.0000	43.7	54.0	-10.3	Av
3653.0000	39.2	54.0	-14.8	Av
3677.0000	48.6	54.0	-5.4	Av
4563.7500	46.9	54.0	-7.1	Av
4576.2500	46.0	54.0	-8.0	Av
4578.7500	41.4	54.0	-12.6	Av
4603.7500	47.6	54.0	-6.4	Av
4611.2500	43.7	54.0	-10.3	Av
4618.7500	40.5	54.0	-13.5	Av
5416.5000	47.2	54.0	-6.8	Av
5437.5000	46.2	54.0	-7.8	Av
5467.5000	42.8	54.0	-11.2	Av
5470.5000	46.7	54.0	-7.3	Av
6336.7500	44.0	54.0	-10.0	Av
7238.0000	48.2	54.0	-5.8	Av
7350.2500	48.6	54.0	-5.4	Av
7398.0000	41.5	54.0	-12.5	Av
8268.7500	43.4	54.0	-10.6	Av
17935.7500	60.3	74.0	-13.7	Pk
17998.0000	47.8	54.0	-6.2	Av

Figure 8.1-5: Radiated spurious emissions 3.6 GHz to 18 GHz, vertical polarization

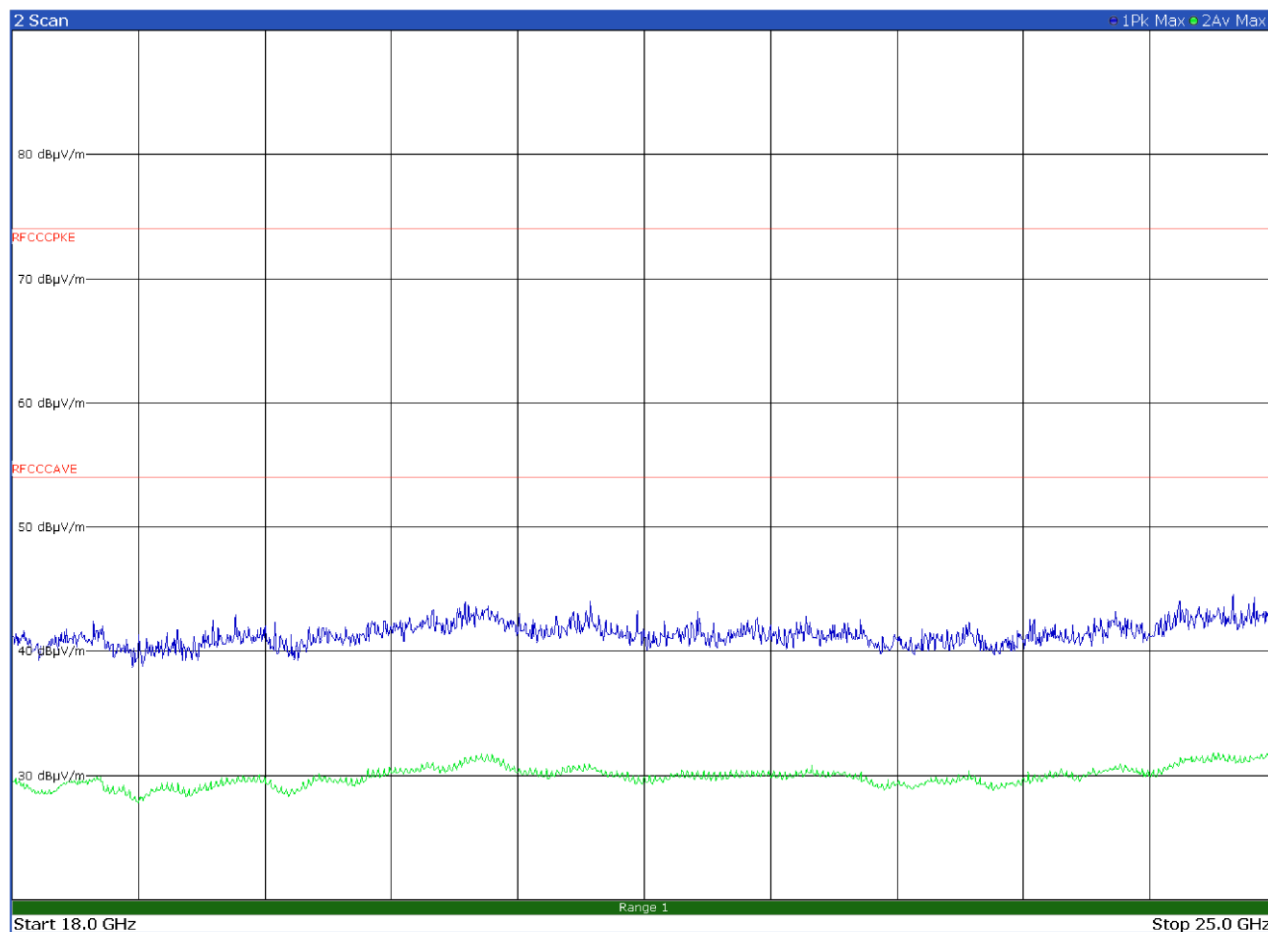


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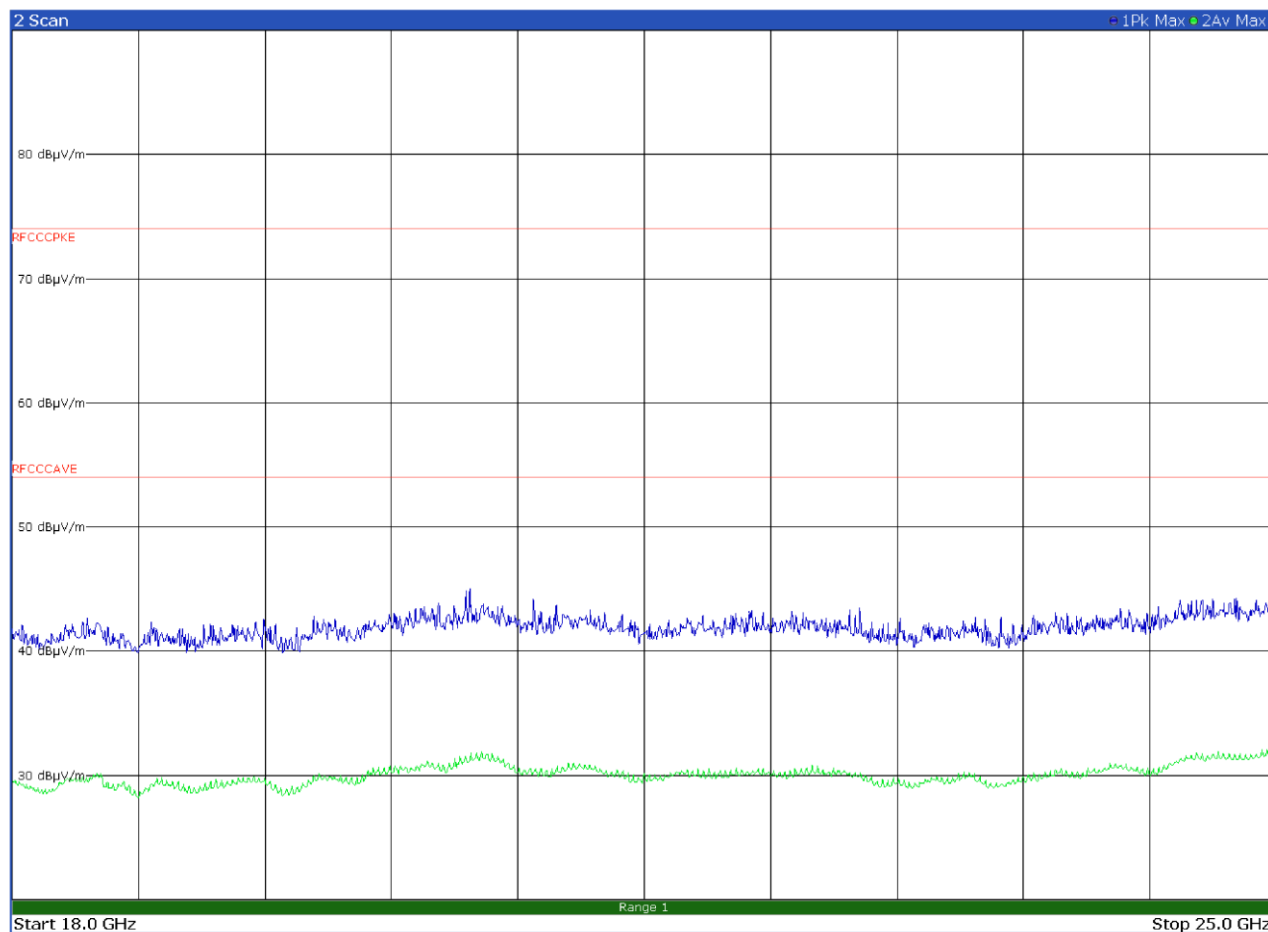
Frequency (MHz)	Level (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)	Detector
3655.0000	48.9	54.0	-5.1	Av
3657.0000	40.3	54.0	-13.7	Av
3667.0000	49.7	54.0	-4.3	Av
3679.0000	41.0	54.0	-13.0	Av
3683.0000	50.7	54.0	-3.3	Av
3689.0000	51.7	54.0	-2.3	Av
4588.7500	40.3	54.0	-13.7	Av
4623.7500	42.8	54.0	-11.2	Av
5449.5000	39.7	54.0	-14.3	Av
5452.5000	39.7	54.0	-14.3	Av
5497.5000	40.0	54.0	-14.0	Av
5542.5000	39.4	54.0	-14.6	Av
7246.0000	46.4	54.0	-7.6	Av
7306.0000	43.4	54.0	-10.6	Av
7386.0000	40.6	54.0	-13.4	Av
7394.0000	41.6	54.0	-12.4	Av
8147.2500	41.7	54.0	-12.3	Av
8192.2500	39.9	54.0	-14.1	Av
8196.7500	40.4	54.0	-13.6	Av
8246.2500	40.2	54.0	-13.8	Av
17939.2500	47.9	54.0	-6.1	Av
17956.2500	60.6	74.0	-13.4	Pk

Figure 8.1-6: Radiated spurious emissions 3.6 GHz to 18 GHz, horizontal polarization



Frequency (MHz)	Level (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Detector
--	--	--	--	--

Figure 8.1-7: Radiated spurious emissions 18 GHz to 25 GHz, horizontal polarization

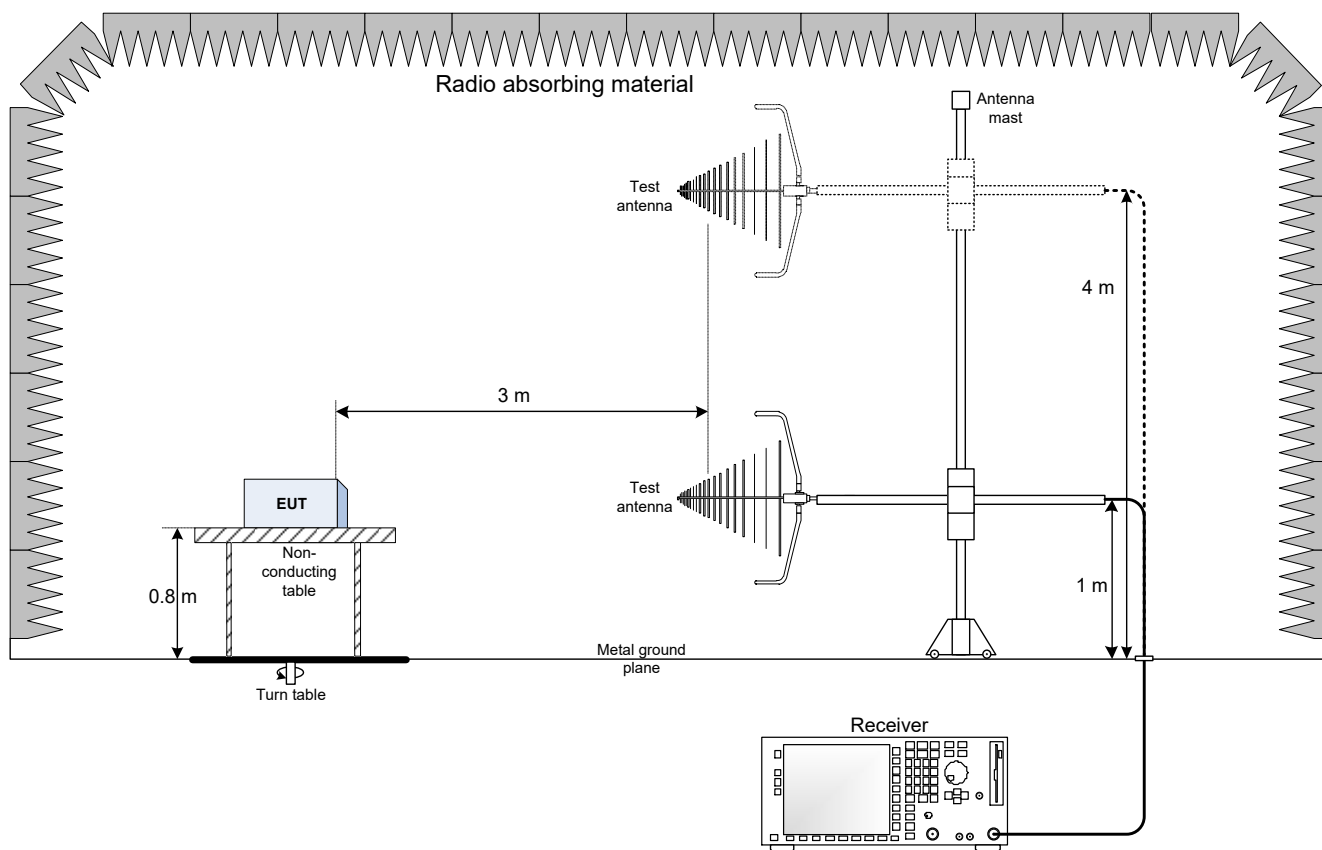


Frequency (MHz)	Level (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Detector
--	--	--	--	--

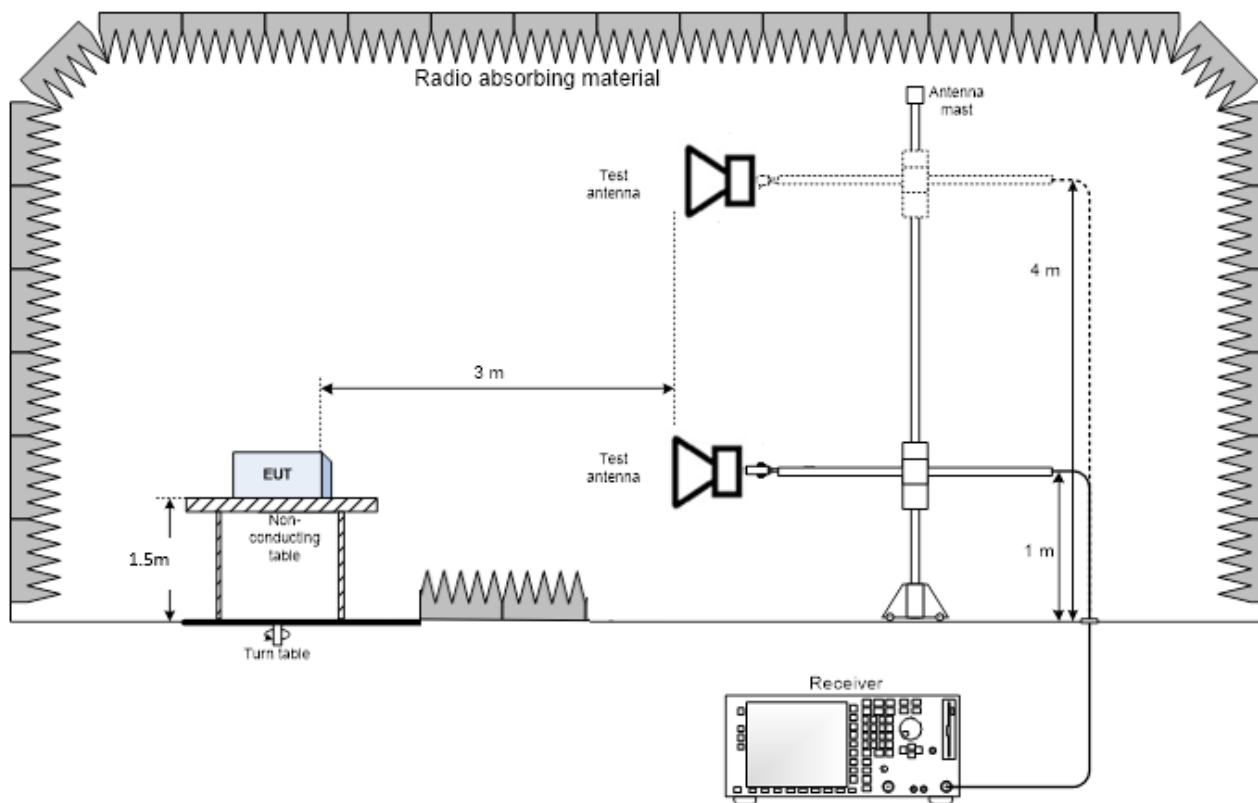
Figure 8.1-8: Radiated spurious emissions 18 GHz to 25 GHz, vertical polarization

Section 9. Block diagrams of test set-ups

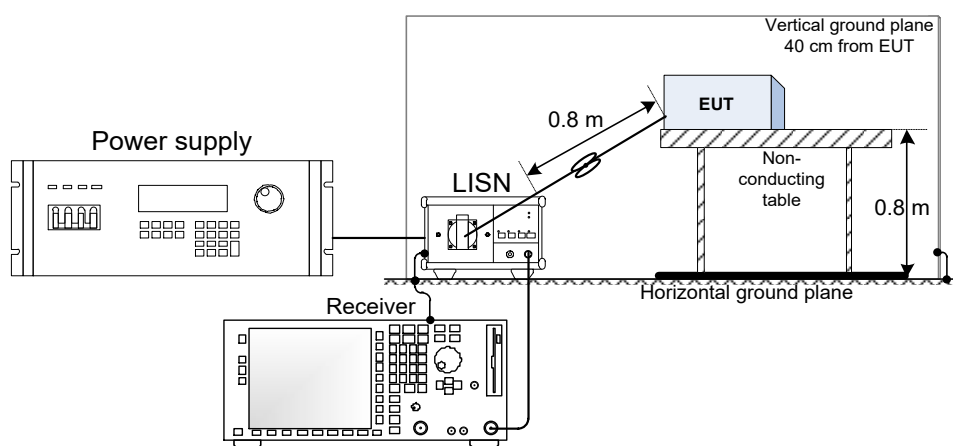
9.1 Radiated emissions set-up for frequencies below 1 GHz



9.2 Radiated emissions set-up for frequencies above 1 GHz



9.3 Conducted emissions set-up

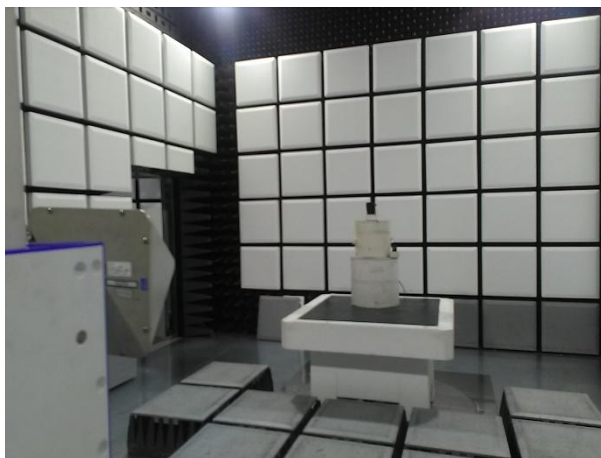


Section 10. Photos

10.1 Test Set-up



30 MHz to 1GHz



1 GHz to 18 GHz



18 GHz to 25 GHz

10.2 EUT









End of report