FCC PART 15, SUBPART C
ISEDC RSS-247, ISSUE 4, July 2025

TEST REPORT

For

Rochester Sensors LLC

1025 S. Belt Line Road, Suite 100,
Coppell, Texas 75019, USA

FCC ID: 2BCFF-0915
IC: 31320-0915

Report Type:	**Product Type:**
Original Report	LPG Tank Monitor
Prepared By:	Shankar Pangeni Project Engineer
Report Number:	R2511072-247
Report Date:	2025-11-26
Reviewed By:	Christian McCaig RF Lead Engineer
Bay Area Compliance Laboratories Corp. 1274 Anvilwood Avenue, Sunnyvale, CA 94089, USA Tel: (408) 732-9162 Fax: (408) 732-9164	

ACCREDITED
CERTIFICATE #3297.02

* This test report may contain data and test methods that are not covered by BACL's scope of accreditation as of the test report date shown above. These items are marked within the test report text with an asterisk "*"

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R2511072-247	Original Report	2025-11-26

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test report is prepared on behalf of *Rochester Sensors LLC*, and their product: LPG Tank Monitor, model: 915 Point Level Sensor, FCC ID: 2BCFF-0915, IC: 31320-0915 or the "EUT" as referred to in this report. The EUT has 2.4 GHz BLE capabilities. The point level sensor is a BLE ready, non-invasive, continuous monitor solution for residential and industrial LPG steel tanks.

Model Name	915 Point Level Sensor
FCC ID	2BCFF-0915
IC	31320-0915
HVIN	9410A00008
Radio Type	BLE
Operating Frequency	2402~2480 MHz
Data rate	1Mbps, 2Mbps

1.2 Mechanical Description of EUT

The EUT measures approximately 58.95 mm (Length) x 30.66 mm (Width) x 102.5 mm (High) and weight less than 0.215 kg.

The data gathered is from a production sample 915 Point Level Sensor provided by Rochester Sensors LLC with BACL assigned S/N: R2511072-1 & R2511072-2

1.3 Objective

This report is prepared on behalf of *Rochester Sensors LLC* in accordance with Part 2, Subpart J, and Part 15, Subpart C of the Federal Communication Commission's rules and ISEDC RSS-247 ISSUE 4, July 2025.

The objective is to determine compliance with FCC Part 15.247 and ISEDC RSS-247 for Antenna Requirement, RF Exposure, Radiated & Conducted Spurious Emissions, Emission Bandwidth, Maximum Output Power, Peak Power Spectral Density, and 100 kHz Band Edges.

In order to determine compliance, the manufacturer or a contracted laboratory makes measurements and takes the necessary steps to ensure that the equipment complies with the appropriate technical standards.

Maintenance of compliance is the responsibility of the manufacturer. Any modification of the product maybe which result in lowering the immunity should be checked to ensure compliance has been maintained (i.e., printed circuit board layout changes, different line filter, different power supply, harnessing and/or I/O cable changes, etc.).

1.4 Related Submittal(s)/Grant(s)

N/A

1.5 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI/USEMCSC C63.10-2020/Cor 1-2023, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices and FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247.

1.6 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Parameter	Measurement uncertainty
Occupied Channel Bandwidth	±5%
RF output power, conducted	±0.57 dB
Power Spectral Density, conducted	±1.48 dB
Unwanted Emissions, conducted	±1.57 dB
All emissions, radiated	±4.0 dB
AC power line Conducted Emission	±2.0 dB
Temperature	±2ºC
Humidity	±5%
DC and low frequency voltages	±1.0%
Time	±2%
Duty Cycle	±3%

1.7 Test Facility Registrations

BACLs test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Innovation, Science, and Economic Development Canada (ISED) a under Registration Numbers: 3062A.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0428.

1.8 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

A- ***An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2017 by A2LA (Test Laboratory Accreditation Certificate Number 3297.02),*** in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2017 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report.

BACL's ISO/IEC 17025:2017 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio/Wireless, RF Exposure, Safety, and Wireline Telecommunications test methods applicable to a wide range of product categories. These product categories include, but are not limited to: Central Office Telecommunications Equipment [including NEBS – Network Equipment Building Systems], Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial Equipment, Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, Railway Equipment, Marine Equipment, and Energy Efficient Lighting. Additionally, BACL offers comprehensive test capabilities for both Unlicensed and Licensed Wireless and RF Devices, per the requirements of the FCC (USA), ISED Canada (Canada), the EU/EEA/EFTA Nations (per the ETSI Standards applicable under the Radio Equipment Directive), Singapore, MIC (Japan), South Korea, Vietnam, and Taiwan ROC.

B- ***A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.03)*** to certify

- For the USA (Federal Communications Commission):
  - 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
  - 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
  - 3- All Telephone Terminal Equipment within FCC Scope C.
- For the Canada (Innovation, Science and Economic Development Canada):
  - 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
  - 2 All Scope 2-Licensed Personal Mobile Radio Services;
  - 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
  - 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
  - 5 All Scope 5-Licensed Fixed Microwave Radio Services
  - 6 All Broadcasting Equipment Technical Standards (BETS) in the Category I Equipment Standards List.
  - 7. RSS-HAC Radio Scope 6 Hearing Aid Compatibility and Volume Control
- For Singapore (Info-Comm Media Development Authority (IMDA)):
  - 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2 IMDA Phase I
  - 2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2 IMDA Phase II
- For the Hong Kong Special Administrative Region & (Office of the Communications Authority-OFCA) – APEC Tel MRA- Phase I and Phase II:
  - 1 Radio Equipment, per KHCA 10XX-series Specifications; HKCA 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1010, 1015, 1016, 1019, 1020, 1022, 1026, 1033, 1034, 1035, 1036, 1037, 1039, 1041, 1042, 1043, 1044, 1045, 1046, 1047, 1048, 1049, 1050, 1052, 1053, 1054, 1056, 1057, 1061, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1080, 1081
  - 2 GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications; HKCA 1218, 1223, 1224, 1225, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1277, 1281, 1282, 1283

3 Fixed Network Equipment, per HKCA 20XX-series Specifications; HKCA 2001, 2011, 2014, 2015, 2017, 2026, 2027, 2028, 2029, 2030, 2031

- For Japan:

1 MIC Telecommunication Business Law (Terminal Equipment):
- All Scope A1 - Terminal Equipment for the Purpose of Calls;
- All Scope A2 - Other Terminal Equipment

2 Radio Law (Radio Equipment):
- All Scope B1 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
- All Scope B2 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
- All Scope B3 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

C- ***A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.01)*** to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

1 Appliances:
- for Clothes Washers (ver. 8.1)
- for Residential Dishwashers (ver. 6.0)
- for Residential Refrigerators and/or Freezers (ver. 5.0)

2 Commercial Food Service Equipment:
- for Commercial Dishwashers (ver. 3.0)
- for Commercial Ice Machines (ver. 3.0)

3 Data Center Equipment:
- for Large Network Equipment (ver. 1.1)

4 Electronics and Office Equipment:
- for Audio/Video Equipment (ver. 3.0)
- for Computers (ver. 8.0)
- for Data Center Storage (ver. 2.1)
- for Displays (ver. 8.0)
- for Enterprise Servers (ver. 4.0)
- for Imaging Equipment (ver. 3.1)
- for Set-top Boxes & Cable Boxes (ver. 5.1)
- for Small Network Equipment (ver. 1.0)
- for Telephony (ver. 3.0)
- for Televisions (ver. 9.0), Title 10 Chapter II CFR Part 430 Subpart B –Appendix BB, Title 10 Chapter II CFR Part 430 Subpart B –Appendix DD

3 Lighting and Fans
- for Decorative Light Strings (ver. 1.5)
- for Downlights (ver. 1.0)
- for Lamps (Light Bulbs)(ver. 2.1)
- for Luminaires (including sub-components) (ver. 2.2)
- for Residential Ceiling Fans (ver. 4.0)
- for Residential Ventilating Fans (ver. 4.1)

4 Other
- for Residential Ceiling Fans (ver. 4.0)

- for Electric Vehicle Supply Equipment (ver. 1.2)(Electric Vehicle Supply Equipment Final Test Method for DC-output EVSE Rev March 2021)
- for Water Coolers (ver. 3.0)
- for Smart Home Energy Management Systems (ver. 1.1)

D- ***A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:***

1. For the USA (Federal Communications Commission), as a Telecommunications Certification Body (TCB):
   - a. All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
   - b. All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
   - c. All Telephone Terminal Equipment within FCC Scope C.

2. Canada (ISED Canada) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II:
   - a. Phase I Designation Letter
   - b. Phase II ISED Canada recognition as a Product Certification Body for unlicensed wireless devices, licensed radios, radars, etc.:

3. For Singapore (InfoComm Media Development Authority (IMDA)) APEC Tel MRA -Phase I & Phase II:
   - a. All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2 IMDA Phase I
   - b. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2 IMDA Phase II

4. For the Hong Kong Special Administrative Region & (Office of the Communications Authority – OFCA) – APEC Tel MRA -Phase I & Phase II:
   - a. NIST Phase I Scope Recognition Letter from OFCA for BACL –US0057
   - b. OFCA Phase II Designation Letter

5. For Japan (Ministry of Communications):
   - a. NIST Japan Recognition
   - b. MIC Telecommunication Business Law (Terminal Equipment):
     1. All Scope A1 – Terminal Equipment for the Purpose of Calls;
     2. All Scope A2 – Other Terminal Equipment
   - c. Radio Law (Radio Equipment):
     1. All Scope B1 – Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
     2. All Scope B2 – Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
     3. All Scope B3 – Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

   - d. Japan VCCI – Voluntary Control Council for Interference US-Japan Telecom Treaty (VCCI Side Letter)
     1. VCCI Certificate
   - d. Japan Registered Certification Body
     1. RCB Recognition Letter
6. European Union:
   1. Radio Equipment Directive [RED] 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
   2. EMC Directive [EMCD] 2014/30/EU US-EU EMC & Telecom MRA CAB (NB):

7. Australia ACMA (Australian Communication and Media Authority) – APEC Tel MRA -Phase I:
    1.Phase I Designation Letter

8. Chinese Taipei (Republic of China – Taiwan):
    1. NCC (National Communications Commission) APEC Tel MRA -Phase I

9. Republic of Korea (Ministry of Communications – Radio Research Laboratory) APEC Tel MRA - Phase I:
    1. NIST Phase I Scope Update Notification Letter from Korea for BACL

10. Vietnam APEC Tel MRA -Phase I (page 13)
    1. Vietnam (MIC) NIST Phase I Scope

11. Indonesia SDPPI (page 6)
    1. Phase I Listing

12. Israel Phase I
    1. NIST Phase I Scope Update Recognition Letter from Israel for BACL –US0057

13. UK Radio and EMC NIST Designation Letters
    UK website: https://www.gov.uk/uk-market-conformity-assessment-bodies/bay-area-compliance-laboratories-corp-bacl
        1. Electromagnetic Compatibility Regulations (SI 2016/1091)
        https://assets.publishing.service.gov.uk/media/5fe1e344e90e07452fce4e5a/AB_1313_BACL_UK_EMC_Regs_NIST_Designation_Extended.pdf

        2. Radio Equipment Regulations 2017 (SI 2017/1206)
        https://assets.publishing.service.gov.uk/media/5fe1e351e90e074525bf7be6/AB_1313_BACL_UK_Radio_Regs_NIST_Designation_Extended.pdf

14. IFT Mexico Phase I
    1. NIST Phase I New Recognition Letter from Mexico for BACL – US0057

15. Taiwan (BSMI) Phase 1 Designation Letter and designation form.
    1. NIST Phase I Scope Update Designation Letter to BSMI for BACL – US0057
    2. NIST Phase I Scope Update Designation Form to BSMI for BACL – US0057

2 System Test Configuration

2.1 Justification

The EUT was configured for testing according to ANSI/USEMCSC C63.10-2020/Cor 1-2023 and FCC KDB 558074 D01 DTS Meas Guidance v05r02.

The EUT was tested in a testing mode to represent worst-case results during the final qualification test.

2.2 EUT Exercise Software

The exercising software used during testing was “STM32CubeMonitor-RF”, the software is compliant with the standard requirements being tested against.

Radio	Frequency (MHz)	Data rate	Power Setting (dBm)
2.4 GHz BLE	2402	1 Mbps	-0.15
	2440		-0.15
	2480		-0.15
	2402	2 Mbps	-0.15
	2440		-0.15
	2480		-0.15

2.3 Duty Cycle Correction Factor

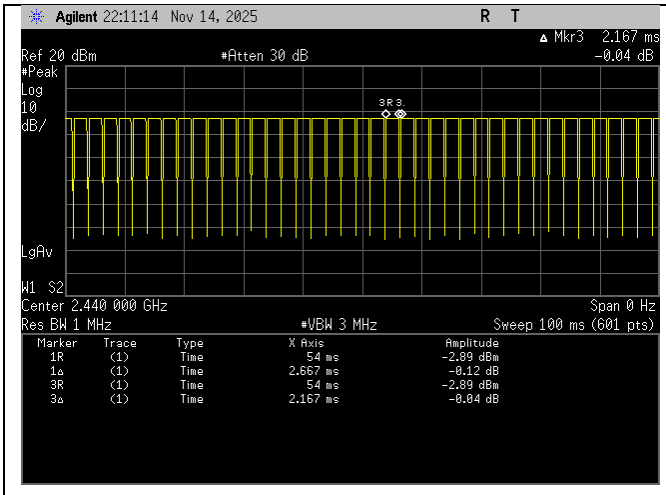
According to KDB 558074 D01 DTS Meas Guidance v05r02 section 6.0:

Preferably, all measurements of maximum conducted (average) output power will be performed with the EUT transmitting continuously (i.e., with a duty cycle of greater than or equal to 98%). When continuous operation cannot be realized, then the use of sweep triggering/signal gating techniques can be utilized to ensure that measurements are made only during transmissions at the maximum power control level. Such sweep triggering/signal gating techniques will require knowledge of the minimum transmission duration (T) over which the transmitter is on and is transmitting at itPs maximum power control level for the tested mode of operation. Sweep triggering/signal gating techniques can then be used if the measurement/sweep time of the analyzer can be set such that it does not exceed T at any time that data is being acquired (i.e., no transmitter off-time is to be considered).

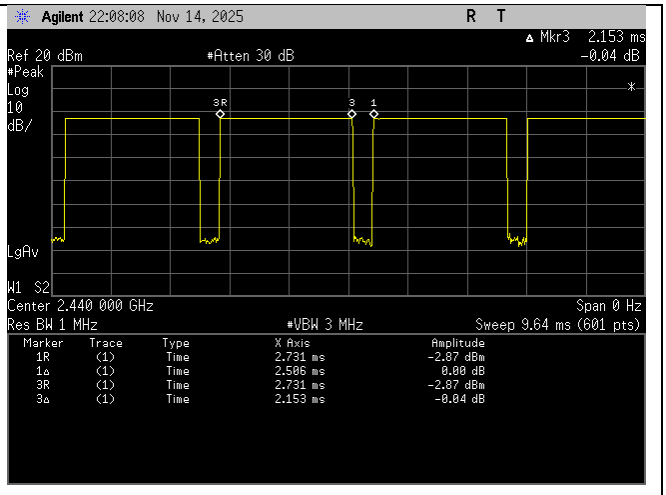
BLE:

Frequency (MHz)	Data Rate	On Time (ms)	Period (ms)	Duty Cycle (%)	Duty Cycle Correction Factor (dB)	1/T (Hz)
2440	1Mbps	2.153	2.506	85.914	0.659	465
2440	2Mbps	1.052	2.465	42.680	3.698	951

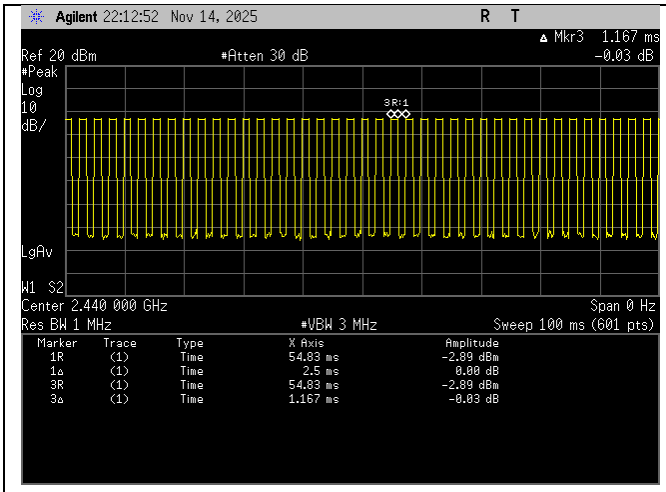
Note: Duty Cycle = On Time (ms)/ Period (ms)
*Duty Cycle Correction Factor = 10*log(1/duty cycle)*



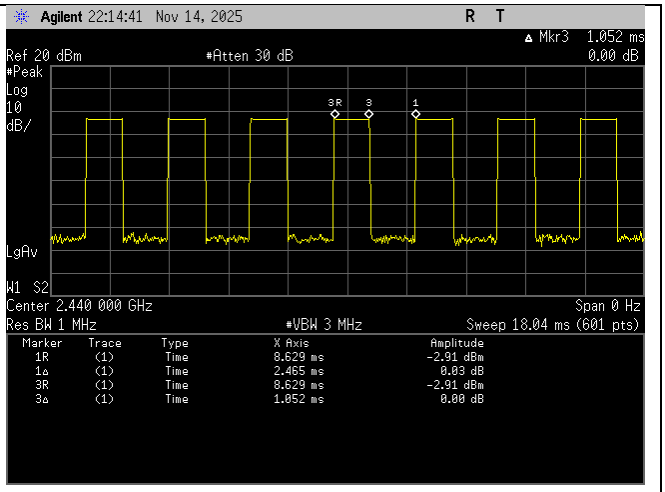
Duty cycle_1Mbps_ sweep time (100ms)



Duty cycle_1Mbps_Zoomed In



Duty cycle_2Mbps_ sweep time (100ms)



Duty cycle_2Mbps_Zoomed In

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2.4 Local Support Equipment

Manufacturer	Description	Model	Serial Number
Dell	Laptop	Latitude 5401	HCJH3Z2
Rochester Sensors LLC	Programming board (PCBA) (Connected to the EUT for BLE Tx operation)	Custom	N/A

2.5 Remote Support Equipment

N/A

2.6 Power Supply and Line Filters

N/A

Note: The EUT is powered by the battery (3.6V & 3.8Ah) model ER18505+SPC1520/W

2.7 Interface Ports and Cabling

Cable Descriptions	Length (m)	From	To
USB (RoHS TTL-232R-3V3)	<1	Programming board (PCBA)	Laptop

3 Summary of Test Results

FCC & ISEDC Rules	Description of Test	Results
FCC §15.203 ISEDC RSS-Gen §6.8	Antenna Requirements	Compliant
FCC §2.1091, §15.247(i) ISEDC RSS-102	RF Exposure	Compliant
FCC §15.207 ISEDC RSS-Gen §8.8	AC Line Conducted Emissions	N/A[1]
FCC §2.1053, §15.35(b), §15.205, §15.209, §15.247(d) ISEDC RSS-247 §6.6 ISEDC RSS-Gen §8.9, §8.10	Radiated Spurious Emissions	Compliant
FCC §15.247(a)(2) ISEDC RSS-247 §6.3.1(a) RSS-Gen §6.7	6 dB & 99% Emission Bandwidth	Compliant
FCC §15.247(b)(3) ISEDC RSS-247 §6.3.2	Maximum Output Power	Compliant
FCC §15.247(e) ISEDC RSS-247 §6.3.1(b)	Power Spectral Density	Compliant
FCC §2.1051, §15.247 (d) ISEDC RSS-247 §6.6	Spurious Emissions at Antenna Port	Compliant
	100 kHz Bandwidth of Frequency Band Edges	Compliant

Note[1]: AC line conducted emissions test not required since EUT is battery powered.

BACL is responsible for all the information provided in this report, except when information is provided by the customer as identified in this report. Information provided by the customer, e.g., antenna gain, can affect the validity of results.

4 FCC §15.203 & ISEDC RSS-Gen §6.8 – Antenna Requirements

4.1 Applicable Standards

According to FCC §15.203:

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 replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited.

And according to FCC §15.247 (b) (4), if transmitting antennas of directional gain greater than 6 dBi are used the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

According to ISEDC RSS-Gen §6.8: Transmitter Antenna

The applicant for equipment certification shall provide a list of all antenna types that may be used with the transmitter, where applicable (i.e. for transmitters with detachable antenna), indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna. The test report shall demonstrate the compliance of the transmitter with the limit for maximum equivalent isotopically radiated power (e.i.r.p.) specified in the applicable RSS, when the transmitter is equipped with any antenna type, selected from this list.

For expediting the testing, measurements may be performed using only the antenna with highest gain of each combination of transmitter and antenna type, with the transmitter output power set at the maximum level. However, the transmitter shall comply with the applicable requirements under all operational conditions and when in combination with any type of antenna from the list provided in the test report (and in the notice to be included in the user manual, provided below).

When measurements at the antenna port are used to determine the RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna's manufacturer.

The test report shall state the RF power, output power setting and spurious emission measurements with each antenna type that is used with the transmitter being tested.

For license-exempt equipment with detachable antennas, the user manual shall also contain the following notice in a conspicuous location:

This radio transmitter has been approved by Innovation, Science and Economic Development Canada to operate with the antenna types listed below, with the maximum permissible gain indicated. Antenna types not included in this list that have a gain greater than the maximum gain indicated for any type listed are strictly prohibited for use with this device.

Immediately following the above notice, the manufacturer shall provide a list of all antenna types which can be used with the transmitter, indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna type.

4.2 Antenna Description

External/Internal/ Integral	Antenna Usage	Antenna Type	Frequency Range (MHz)	Maximum Antenna Gain (dBi)
Integral	2.4 GHz BLE	Inverted-F type PCB	2402-2480	1.45

Note: The antenna gain information were provided by the manufacturer.

5 FCC §2.1091, FCC §15.247(i) & ISEDC RSS-102 – RF Exposure

5.1 Applicable Standards

According to FCC §15.247(i), Radio frequency devices operating under the provisions of this part are subject to the radio frequency radiation exposure requirements specified in §§ 1.1307(b), 1.1310, 2.1091, and 2.1093 of this chapter, as appropriate. Applications for equipment authorization of mobile or portable devices operating under this section must contain a statement confirming compliance with these requirements. Technical information showing the basis for this statement must be submitted to the Commission upon request.

According to FCC §2.1091, and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm^2)	Averaging Time (minutes)
Limits for General Population/Uncontrolled Exposure				
0.3-1.34	614	1.63	* (100)	30
1.34-30	824/f	2.19/f	* ($180/f^2$)	30
30-300	27.5	0.073	0.2	30
300-1500	/	/	f/1500	30
1500-100,000	/	/	1.0	30

f = frequency in MHz
* = Plane-wave equivalent power density

According to ISED RSS-102 Issue 6:

6.6 Field reference level exposure exemption limits

Field reference level (FRL) exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm (i.e. mobile devices), except when the device operates as follows:

- below 20 MHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than 1 W (adjusted for tune-up tolerance)
- at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than $4.49/f^{0.5} W$ (adjusted for tune-up tolerance), where f is in MHz
- at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than 0.6 W (adjusted for tune-up tolerance)
- at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than $1.31 \times 10^{-2} f^{0.6834} W$ (adjusted for tune-up tolerance), where f is in MHz
- at or above 6 GHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than 5 W (adjusted for tune-up tolerance)

In these cases, the information contained in the RF exposure technical brief may be limited to information that demonstrates how the EIRP was derived.

5.2 MPE Prediction:

Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

$$S = PG/4\pi R^2$$

Where: S= power density (in appropriate units, e.g. mW/cm2)
P = power input to the antenna (in appropriate units, e.g., mW)
G = power gain of the antenna in the direction of interest relative to an isotropic radiator
R = distance to the center of radiation of the antenna (appropriate units, e.g., cm)

5.3 MPE Results for FCC

Worst Mode: 1Mbps

Maximum output power at antenna input terminal (dBm):	-1
Maximum output power at antenna input terminal (mW):	0.794
Prediction distance (cm):	20
Prediction frequency (MHz):	2440
Maximum Antenna Gain, typical (dBi):	1.45
Maximum Antenna Gain (numeric):	1.396
Power density of prediction frequency at 20.0 cm (mW/cm^2):	0.00022
FCC MPE limit for uncontrolled exposure at prediction frequency (mW/cm^2):	1.0

The device is compliant with the requirement MPE limit for uncontrolled exposure. The maximum power density at the distance of 20 cm is 0.00022 mW/cm^2. Limit is 1 mW/cm^2.

5.4 IC Evaluation

EIRP = -1dBm + 1.45dBi = 0.45dBm (0.0011W) < 1.31 x $10^{-2}f^{0.6834}$W (2.7W)

The device is compliant with the requirement Field reference level exposure exemption limits for uncontrolled exposure.

Note: Tune up power achieved by rounding up to nearest whole dBm value.

6 FCC §15.35(b), §15.205, §15.209, §15.247(d) & ISEDC RSS-247 §6.6, RSS-Gen §8.9, §8.10 – Spurious Radiated Emissions

6.1 Applicable Standards

As per FCC §15.35(b): Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz.

As Per FCC §15.205(a) except as show in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090 – 0.110 0.495 – 0.505 2.1735 – 2.1905 4.125 – 4.128 4.17725 – 4.17775 4.20725 – 4.20775 6.215 – 6.218 6.26775 – 6.26825 6.31175 – 6.31225 8.291 – 8.294 8.362 – 8.366 8.37625 – 8.38675 8.41425 – 8.41475 12.29 – 12.293 12.51975 – 12.52025 12.57675 – 12.57725 13.36 – 13.41	16.42 – 16.423 16.69475 – 16.69525 25.5 – 25.67 37.5 – 38.25 73 – 74.6 74.8 – 75.2 108 – 121.94 123 – 138 149.9 – 150.05 156.52475 – 156.52525 156.7 – 156.9 162.0125 –167.17 167.72 – 173.2 240 – 285 322 – 335.4 399.9 – 410 608 – 614	960 – 1240 1300 – 1427 1435 – 1626.5 1645.5 – 1646.5 1660 – 1710 1718.8 – 1722.2 2200 – 2300 2310 – 2390 2483.5 – 2500 2690 – 2900 3260 – 3267 3.332 – 3.339 3 3458 – 3 358 3.600 – 4.400	4. 5 – 5. 15 5. 35 – 5. 46 7.25 – 7.75 8.025 – 8.5 9.0 – 9.2 9.3 – 9.5 10.6 – 12.7 13.25 – 13.4 14.47 – 14.5 15.35 – 16.2 17.7 – 21.4 22.01 – 23.12 23.6 – 24.0 31.2 – 31.8 36.43 – 36.5 Above 38.6

As per FCC §15.209(a): Except as provided elsewhere in this Subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

Frequency (MHz)	Field Strength (micro volts/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

** Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

As per FCC §15.247 (d),

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).

As per ISEDC RSS-247 §6.6,

In any 100 kHz bandwidth outside the frequency band in which the spread spectrum device, digitally modulated device, or hybrid system 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 6.3.2, the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

As per ISEDC RSS-Gen §8.9,

Except where otherwise indicated in the applicable RSS, radiated emissions shall comply with the field strength limits shown in table 5 and table 6. Additionally, the level of any transmitter unwanted emission shall not exceed the level of the transmitter's fundamental emission.

Table 5 – General field strength limits at frequencies above 30 MHz

Frequency (MHz)	Field Strength (µV/m at 3 m)
30 – 88	100
88 – 216	150
216 – 960	200
Above 960	500

Table 6 – General field strength limits at frequencies below 30 MHz

Frequency	Field Strength (micro volts/meter)	Measurement Distance (meters)
9 – 490 kHz[Note 1]	6.37/F (F in kHz)	300
490 – 1705 kHz	63.7/F (F in kHz)	30
1.705 – 30 MHz	0.08	30

Note 1: The emission limits for the ranges 9-90 kHz and 110-490 kHz are based on measurements employing a linear average detector.

As per ISEDC RSS-Gen §8.10(c),

Unwanted emissions that do not fall within the restricted frequency bands listed in table 7 shall comply either with the limits specified in the applicable RSS or with those specified in table 5 and table 6.

Table 7 – Restricted frequency bands[Note 1]

MHz	MHz	GHz
0.090 – 0.110	149.9 – 150.05	9.0 – 9.2
0.495 – 0.505	156.52475 – 156.52525	9.3 – 9.5
2.1735 – 2.1905	156.7 – 156.9	10.6 – 12.7
3.020 – 3.026	162.0125 –167.17	13.25 – 13.4
4.125 – 4.128	167.72 – 173.2	14.47 – 14.5
4.17725 – 4.17775	240 – 285	15.35 – 16.2
4.20725 – 4.20775	322 – 335.4	17.7 – 21.4
5.677 – 5.683	399.9 – 410	22.01 – 23.12
6.215 – 6.218	608 – 614	23.6 – 24.0
6.26775 – 6.26825	960 – 1427	31.2 – 31.8
6.31175 – 6.31225	1435 – 1626.5	36.43 – 36.5
8.291 – 8.294	1645.5 – 1646.5	Above 38.6
8.362 – 8.366	1660 – 1710	
8.37625 – 8.38675	1718.8 – 1722.2	
8.41425 – 8.41475	2200 – 2300	
12.29 – 12.293	2310 – 2390	
12.51975 – 12.52025	2483.5 – 2500	
12.57675 – 12.57725	2655 – 2900	
13.36 – 13.41	3260 – 3267	
16.42 – 16.423	3332 – 3339	
16.69475 – 16.69525	3345.8 – 3358	
16.80425 – 16.80475	3500 – 4400	
25.5 – 25.67	4500 – 5150	
37.5 – 38.25	5350 – 5460	
73 – 74.6	7250 – 7750	
74.8 – 75.2	8025 – 8500	
108 – 138		

Note 1: Certain frequency bands listed in table 7 and in bands above 38.6 GHz are designated for licence-exempt applications. These frequency bands and the requirements that apply to related devices are set out in the 200 and 300 series of RSSs.

6.2 Test Setup

The radiated emissions tests were performed in the 5-meter chamber, using the setup in accordance with ANSI/USEMCSC C63.10-2020/Cor 1-2023. The specification used was the FCC §15.247 and ISEDC RSS-247 limits.

The spacing between the peripherals was 10 centimeters.

External I/O cables were draped along the edge of the test table and bundled when necessary.

6.3 Test Procedure

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all installation combinations.

The EUT was set 3 meter away from the testing antenna, which was varied from 1-4 meters, and the EUT was placed on a turntable, which was 0.8 meters and 1.5 meters above the ground plane for below and above 1000 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna's polarity should be changed between horizontal and vertical.

The spectrum analyzer or receiver was set as:

9 kHz-150 kHz

RBW = 200Hz /VBW = 1kHz

150 kHz-30 MHz

RBW = 9kHz /VBW = 30kHz

30 MHz- 1000 MHz:

RBW = 100 kHz / VBW = 300 kHz / Sweep = Auto

Above 1000 MHz:

(1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto
(2) Average: RBW = 1MHz / VBW > 1/T / Sweep = Auto

6.4 Corrected Amplitude and Margin Calculation

For emissions below 1 GHz,

The Corrected Amplitude (CA) is calculated by adding the Correction Factor to the S.A. Reading. The basic equation is as follows:

CA = S.A. Reading + Correction Factor

For example, a corrected amplitude of 40.3 dBuV/m = S.A. Reading (32.5 dBuV) + Correction Factor (7.8 dB/m)

The Correction Factor is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) together. This calculation is done in the measurement software, and reported in the test result section. The basic equation is as follows:

Correction Factor = AF + CL + Atten – Ga

The "Margin" column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

Margin = Corrected Amplitude – Limit

For emission above 1 GHz,

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

CA = Ai + AF + CL + Atten – Ga

For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

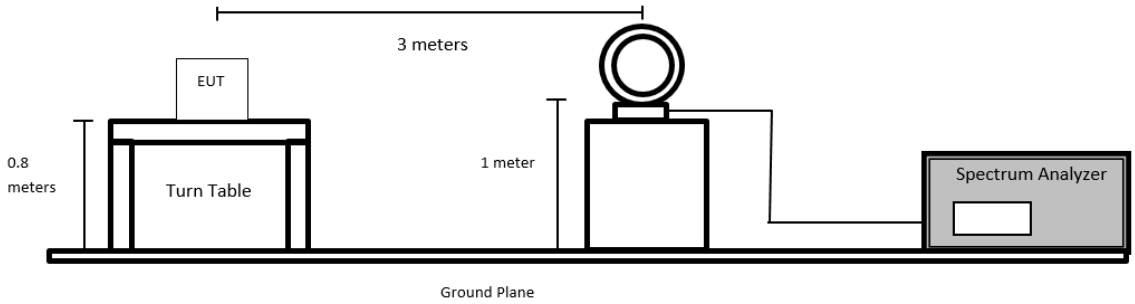
The "Margin" column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

Margin = Corrected Amplitude – Limit

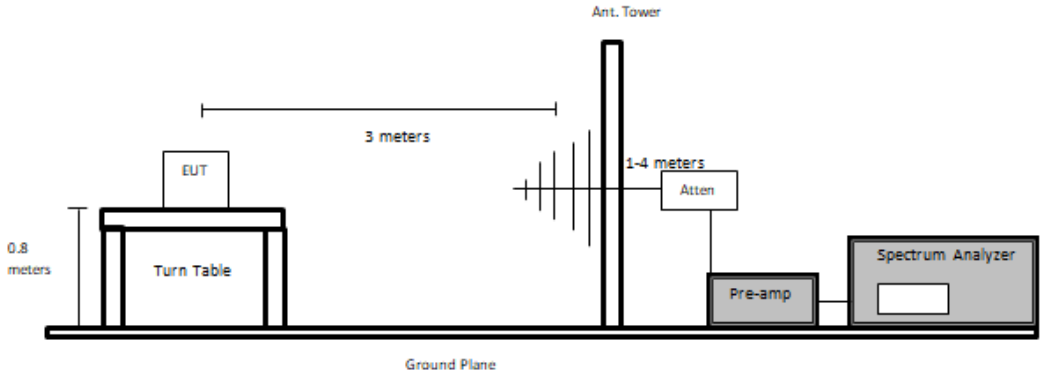
6.5 Test Setup Block Diagram

Radiated:

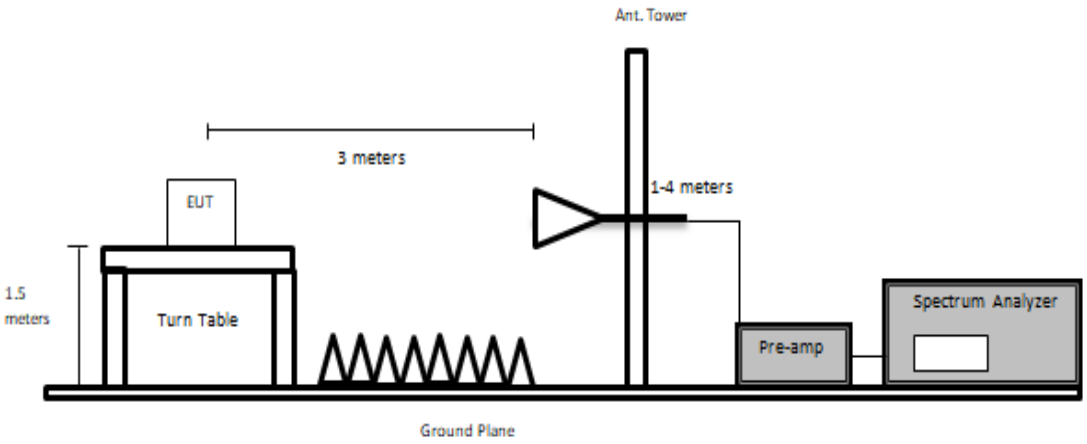
9 kHz to 30 MHz Test Setup



30 MHz to 1 GHz Test Setup



Above 1 GHz Test Setup



6.6 Test Equipment List and Details

BACL No.	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
327	Sunol Sciences	System Controller	SC110V	122303-1	N/R	N/R
1075	Sunol Sciences	Boresight Tower	TLT3	050119-7	N/R	N/R
1388	Sunol Sciences	Flush Mount Turntable	FM	112005-2	N/R	N/R
287	Agilent	Spectrum Analyzer	E4446A	US44300386	2025-05-29	1 year
1432	Keysight Technologies	MXE EMI Receiver, Multi-touch	N9038B	MY60180008	2025-01-03	1 year
404	HP	Preamplifier 100 kHz - 1300 MHz	8447D OPT 010	2944A07030	2025-05-05	1 year
321	Sunol Sciences	Biconilog Antenna 30MHz-1GHz	JB3	A020106-2; 1504	2023-12-18	2 years
1245	Pasternack	6dB Attenuator	PE7390-6	01182018A	2023-12-18	2 years
1246	Hewlet Packard	RF Limiter 9KHz-1GHz	11867A	01734	2025-09-09	6 months
1210	Pasternack	N-type Coax Cable, 50ft RG213	PE3496-0600	2103161	2025-05-09	1 year
1248	Pasternack	RG214 COAX Cable 9 kHz - 1 GHz	PE3062	NA	2025-10-03	6 months
1249	Time microwave	LMR-400 Cable 9 kHz - 1 GHz	AE13684	2k80612-5 6fts	2025-09-09	6 months
1192	ETS Lindgren	Horn Antenna 1-18GHz	3117	00218973	2024-10-23	2 years
1449	BACL	Preamplifier 100MHz-18GHz	BACL1313-A100M18G	4052472	2025-08-18	6 months
90	Wisewave	Horn Antenna 18-26.5GHz	ARH-4223-02	10555-01	2025-05-06	2 years
393	Com-Power	Loop Antenna, Active	AL-130	17043	2025-05-06	2 years
1451	BACL	Preamplifier 18-40GHz	BACL-1313-A1840	4052432	2025-08-18	6 months
1545	Megaphase	K-type coax cable	TM40-K1K3-12	20869601 001	2025-08-18	6 months
1546	Megaphase	SMA coax cable	TM26-S1S3-12	20869602 001	2025-08-18	6 months
1295	CarlisleIT	10m Coaxial Cable	UFB142A-1-3937-200200	64639890912-001	2025-10-16	6 months
672	Micro-Tronics	2.4 - 2.6GHz Notch Filter	BRM50701	160	2025-03-07	1 year

Statement of Traceability: BACL Corp. *attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".*

6.7 Test Environmental Conditions

Temperature:	20 – 22.5°C
Relative Humidity:	55%
ATM Pressure:	101.85 kPa

The radiated testing was performed by Shankar Pangeni from 2025-11-11 to 2025-11-19 in 5m chamber 3.

6.8 Summary of Test Results

According to the data hereinafter, the EUT complied with the FCC Part 15.209, 15.247 and ISEDC RSS-247 standards' radiated emissions limits, and had the worst margin of:

Worst Case – 1Mbps Mode: Transmitting			
Margin (dB)	**Frequency (MHz)**	**Polarization (Horizontal/Vertical)**	**Configuration**
-4.16	4804.415	V	1Mbps, 2440 MHz

Please refer to the tables and plots in the next section for detailed test results.

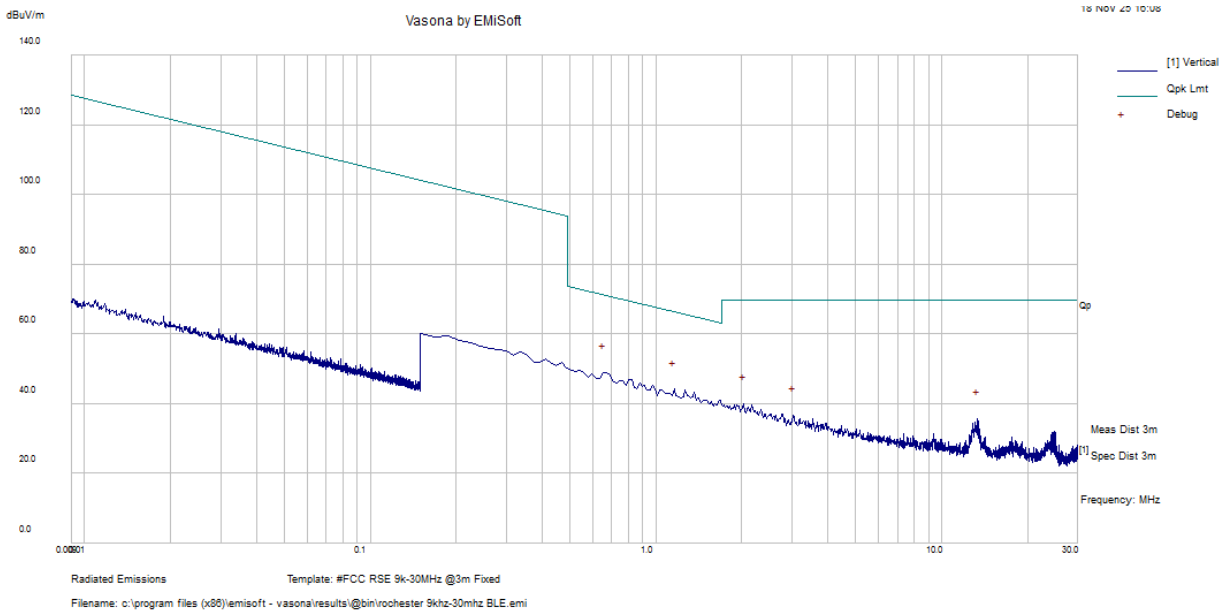
6.9 Radiated Emissions Test Results

Note:
1. Below test data are the radiated spurious emission measurements, please refer to ANNEX E for radiated band edge measurement.
2. Pre-scan was performed in order to determine worst-case orientation of device with respect to measurement antenna in the X/Y/Z axis. Plots/data shown represent measurements made in worst-case orientation.

1) 9 kHz – 30 MHz, Measured at 3 meters

Note: Highest power is measured at 2440MHz at 1Mbps and used as worst case configuration to show compliance for 9 kHz to 30MHz.

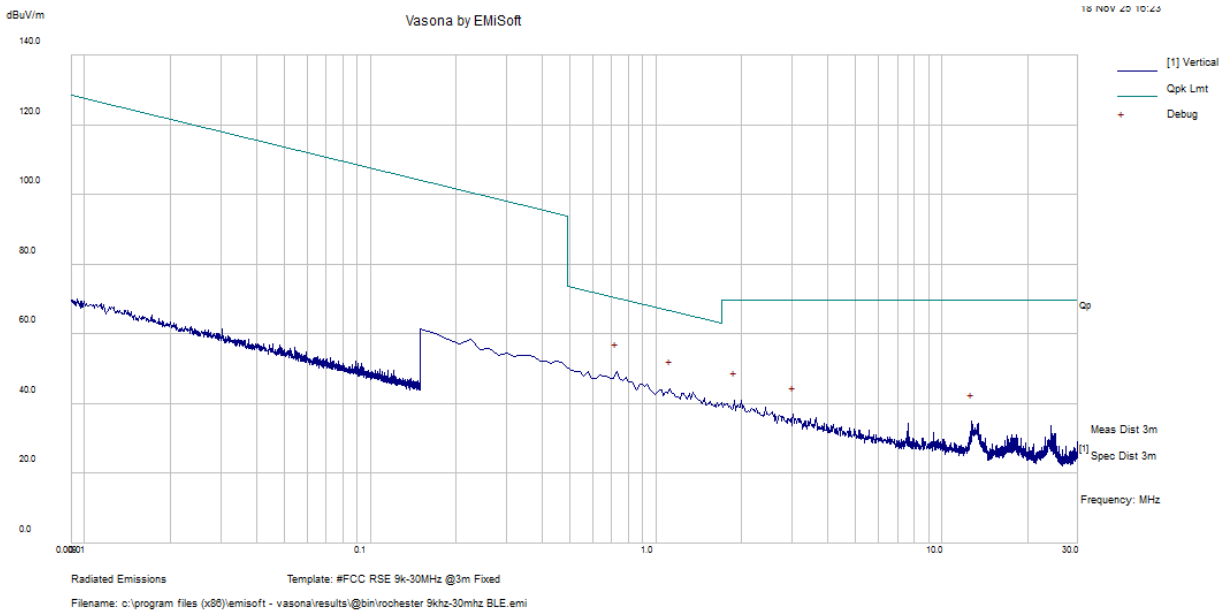
Parallel



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Position	Limit (dBµV/m)	Margin (dB)	Detector
1.157438	34.07	10.11	44.18	Parallel	66.33	-22.16	Peak
0.653719	38.73	10.13	48.87	Parallel	71.3	-22.43	Peak
2.034281	29.66	10.36	40.02	Parallel	69.54	-29.52	Peak
3.023063	26.2	10.44	36.64	Parallel	69.54	-32.9	Peak
13.35863	24.96	10.67	35.64	Parallel	69.54	-33.9	Peak

Note: Peak emissions are compared to QP limits to show worst-case compliance.

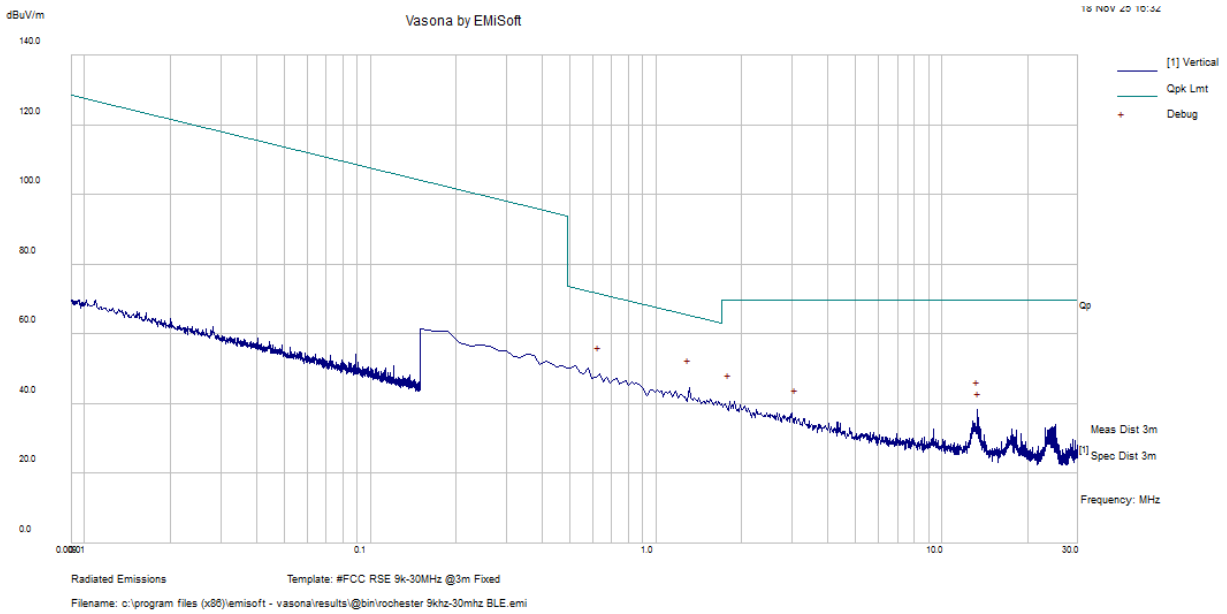
Perpendicular



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Position	Limit (dBµV/m)	Margin (dB)	Detector
0.728344	39.16	10.11	49.27	Perpendicular	70.36	-21.09	Peak
1.120125	34.16	10.1	44.25	Perpendicular	66.62	-22.37	Peak
1.885031	30.58	10.34	40.91	Perpendicular	69.54	-28.63	Peak
3.023063	26.41	10.44	36.85	Perpendicular	69.54	-32.69	Peak
12.74297	24.17	10.7	34.88	Perpendicular	69.54	-34.67	Peak

Note: Peak emissions are compared to QP limits to show worst-case compliance.

Parallel to the ground plane



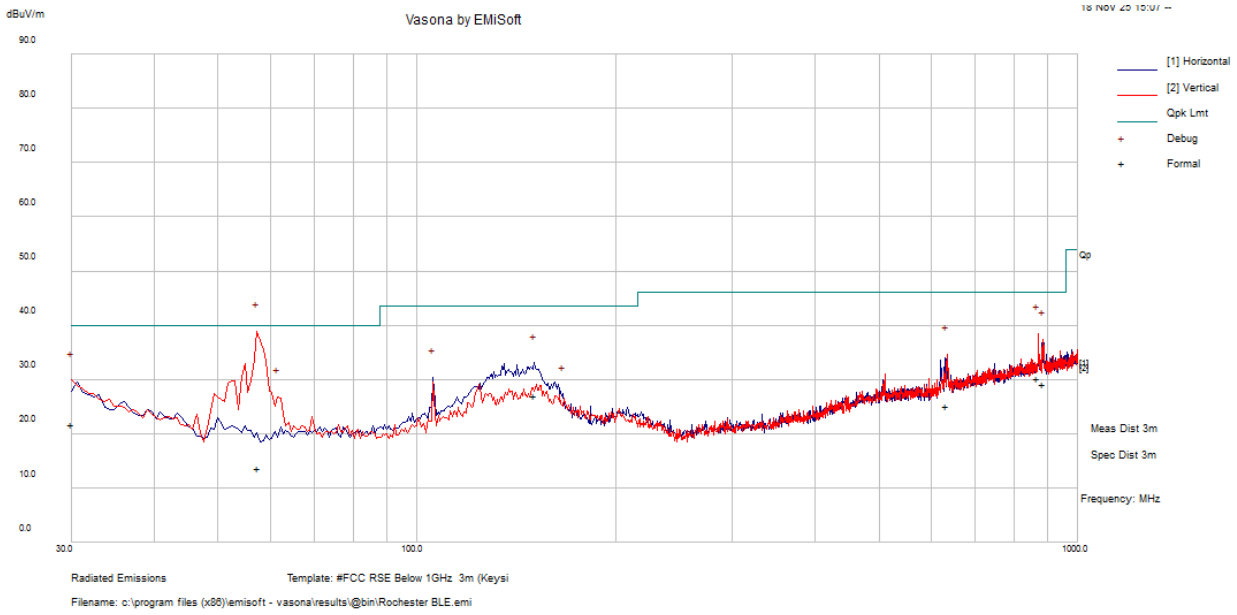
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Position	Limit (dBµV/m)	Margin (dB)	Detector
1.306688	34.35	10.17	44.52	Ground-Parallel	65.28	-20.76	Peak
0.635063	38.24	10.14	48.38	Ground-Parallel	71.55	-23.17	Peak
1.810406	30.19	10.31	40.5	Ground-Parallel	69.54	-29.04	Peak
13.35863	27.62	10.67	38.3	Ground-Parallel	69.54	-31.24	Peak
3.079031	25.64	10.44	36.07	Ground-Parallel	69.54	-33.47	Peak
13.47056	24.34	10.66	35.01	Ground-Parallel	69.54	-34.53	Peak

Note: Peak emissions are compared to QP limits to show worst-case compliance.

2) 30 MHz – 1 GHz, Measured at 3 meters

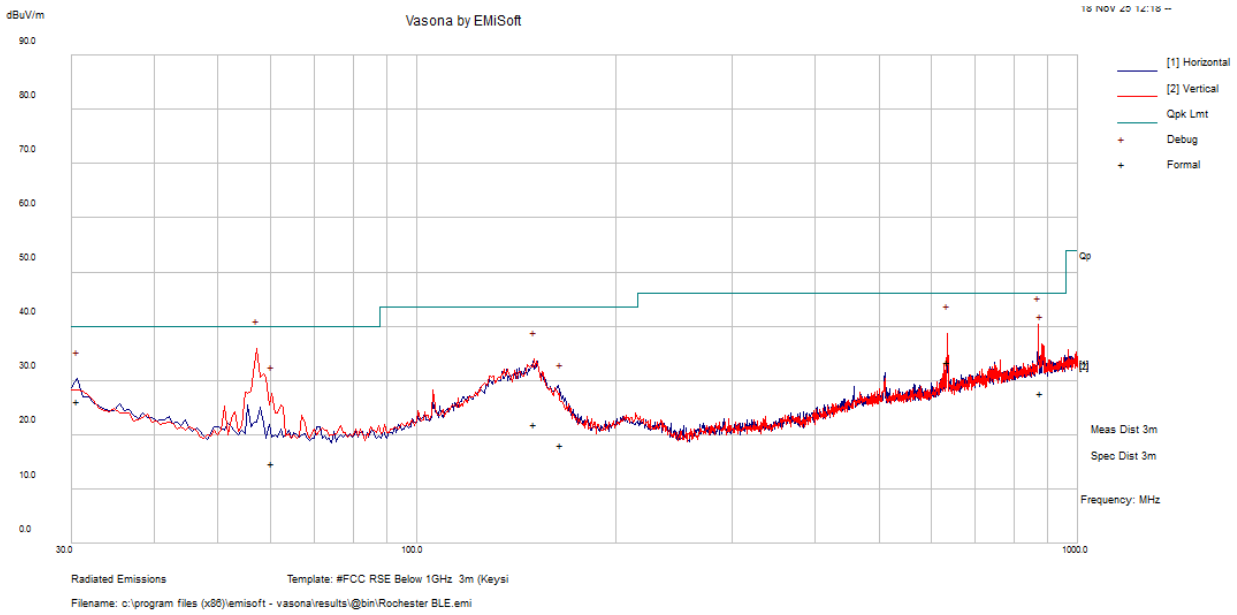
Note: Highest power is measured at 1Mbps and used as worst case configuration to show compliance for 30MHz to 1GHz.

BLE (1Mbps), 2402 MHz



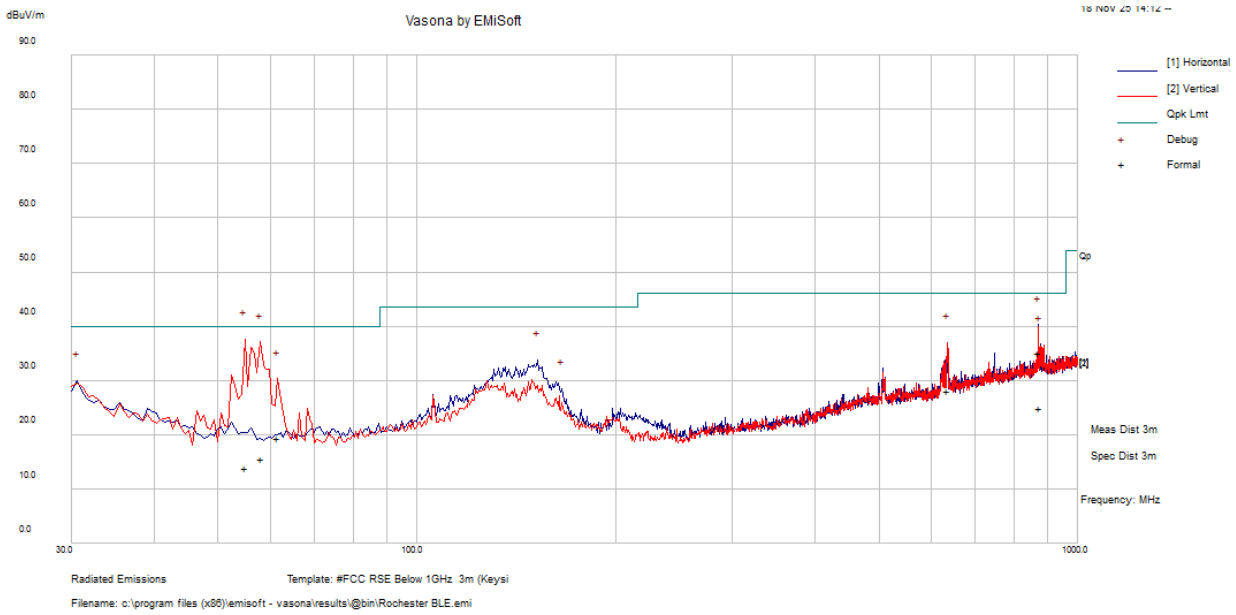
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Polarity (H/V)	Antenna Height (cm)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Detector
870.4881	34.98	-4.85	30.13	H	235	323	46	-15.87	QP
886.5747	33.87	-4.66	29.21	V	294	187	46	-16.79	QP
30	31.97	-10.22	21.75	V	253	115	40	-18.26	QP
150.4481	44.29	-17.23	27.07	H	184	130	43.5	-16.43	QP
633.7622	32.73	-7.71	25.02	V	198	77	46	-20.98	QP
57.5025	37.02	-23.35	13.68	V	280	167	40	-26.32	QP

BLE (1Mbps), 2440 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Polarity (H/V)	Antenna Height (cm)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Detector
634.8322	40.98	-7.68	33.3	V	167	244	46	-12.7	QP
881.0269	32.41	-4.7	27.72	V	302	232	46	-18.28	QP
150.5094	39.09	-17.23	21.86	V	255	141	43.5	-21.64	QP
30.61781	36.88	-10.71	26.17	H	103	14	40	-13.83	QP
60.29438	37.91	-23.13	14.79	V	243	105	40	-25.21	QP
165.3428	35.66	-17.59	18.07	H	112	288	43.5	-25.43	QP

BLE (1Mbps), 2480 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Polarity (H/V)	Antenna Height (cm)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Detector
58.26719	38.81	-23.29	15.53	V	142	171	40	-24.47	QP
870.8966	39.86	-4.84	35.02	V	140	243	46	-10.98	QP
634.5881	35.78	-7.68	28.1	V	212	46	46	-17.9	QP
877.3344	29.53	-4.74	24.79	H	258	335	46	-21.21	QP
61.48406	42.43	-23	19.43	V	98	302	40	-20.57	QP
55.03188	37.32	-23.53	13.79	V	285	19	40	-26.21	QP

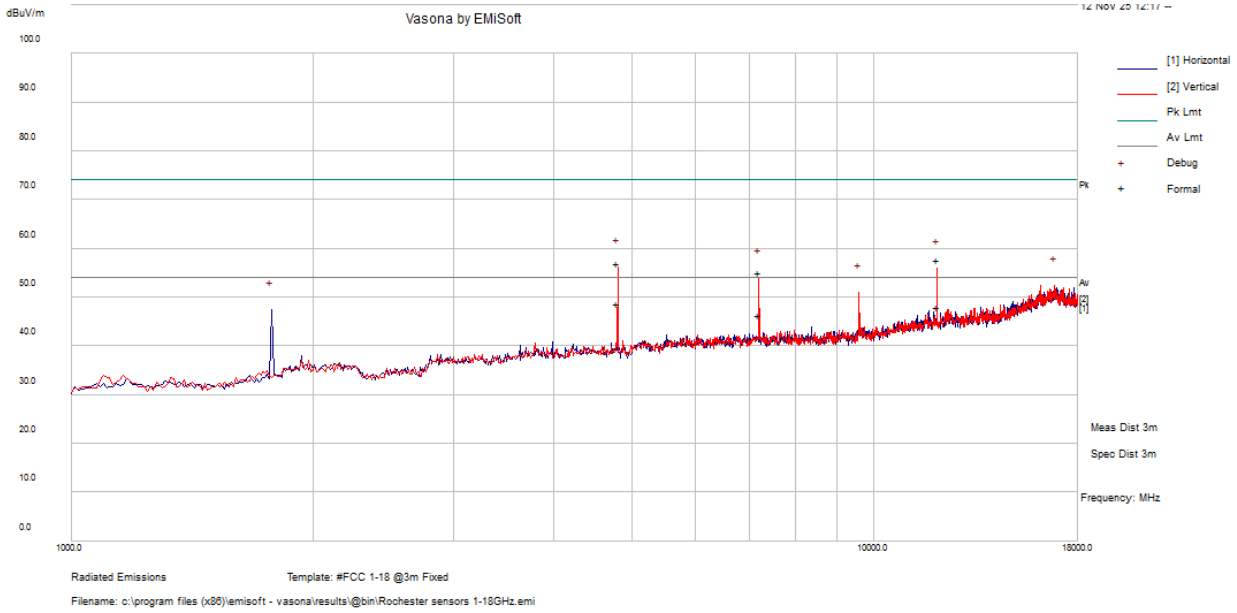
FCC/IC Limits for 1 GHz to 26.5 GHz			
Applicability	**(dBm)**	**(uV/m at 3meters)**	**(dBuV/m at 3meters)**
Restricted Band Average Limit	-	500	54
Restricted Band Peak Limit[1]	-	-	74

Note[1]: Restricted Band Peak Limit is defined to be 20dB higher than Average Limit.

3) 1 GHz – 18 GHz, Measured at 3 meters

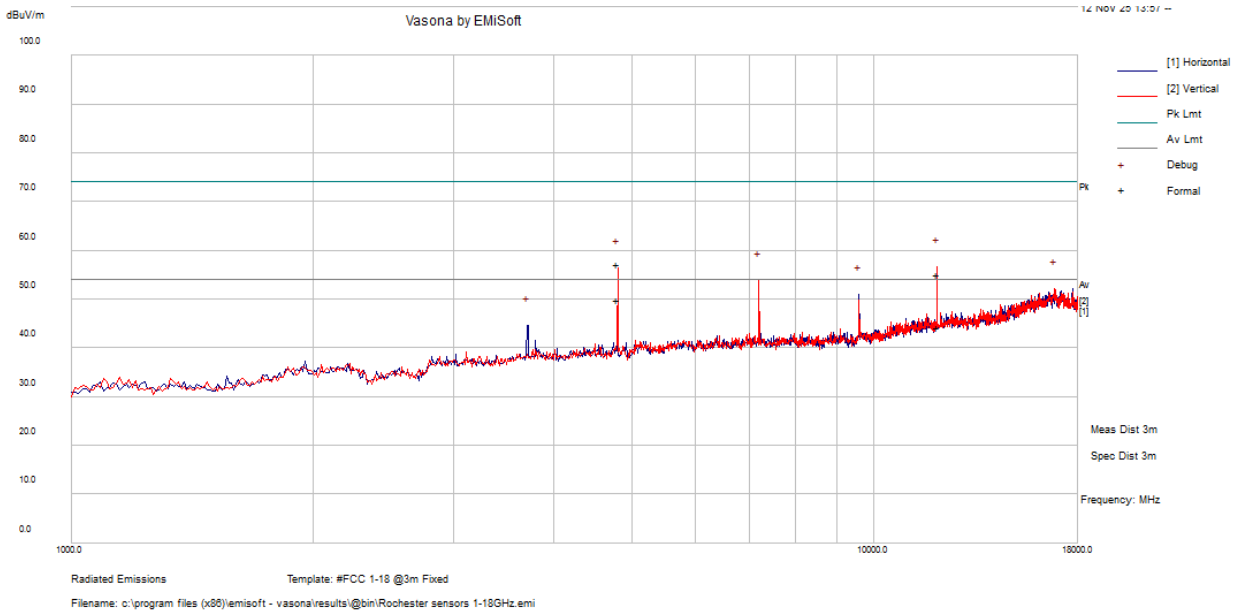
Note: Highest power is measured at 1Mbps and used as worst case configuration to show compliance for 1GHz to 18GHz.

BLE (1Mbps), 2402 MHz



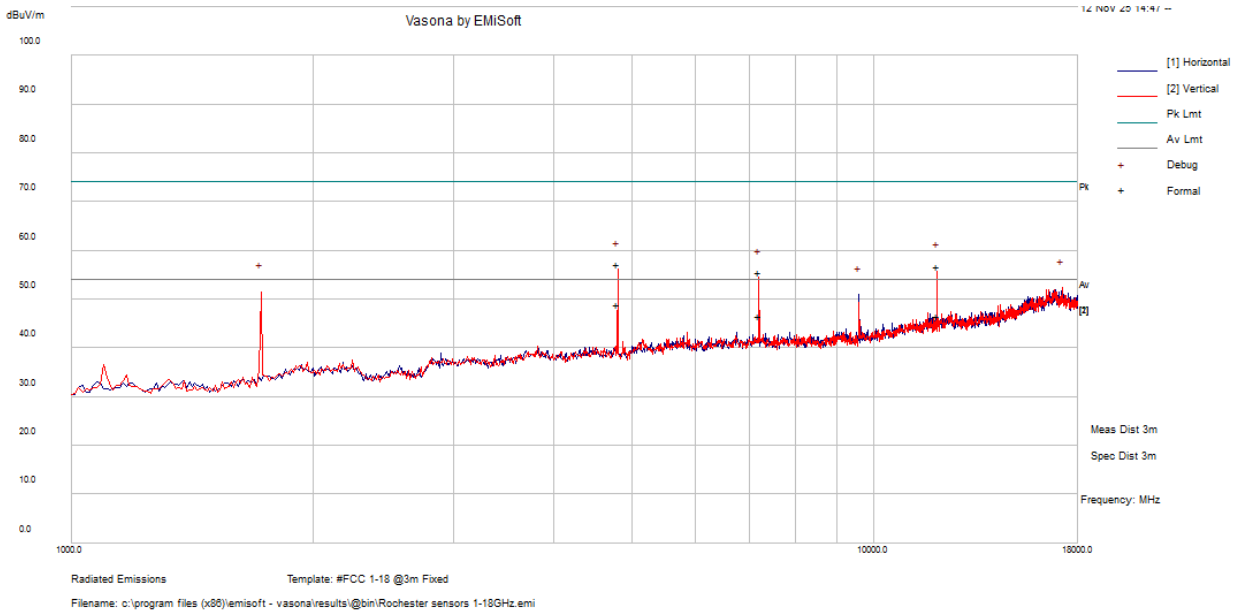
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Polarity (H/V)	Antenna Height (cm)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Detector
4804.518	56.96	-0.03	56.93	V	123	330	74	-17.06	Peak
12008.76	47.3	10.44	57.74	V	101	45	74	-16.26	Peak
7206.653	51.93	3.14	55.07	V	119	191	74	-18.94	Peak
4804.518	48.72	-0.03	48.7	V	123	330	54	-5.3	Average
12008.76	37.44	10.44	47.87	V	101	45	54	-6.13	Average
7206.653	43.27	3.14	46.41	V	119	191	54	-7.59	Average

BLE (1Mbps), 2440 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Polarity (H/V)	Antenna Height (cm)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Detector
12008.66	44.7	10.44	55.14	V	135	54	74	-18.86	Peak
4804.415	57.13	-0.02	57.1	V	161	194	74	-16.9	Peak
7205.5	50.83	3.14	53.97	V	100	0	74	-20.03	Peak
12008.66	33.81	10.44	44.24	V	135	54	54	-9.76	Average
4804.415	49.87	-0.02	49.84	V	161	194	54	-4.16	Average
7205.5	40.83	3.14	43.97	V	100	0	54	-10.03	Average

BLE (1Mbps), 2480 MHz

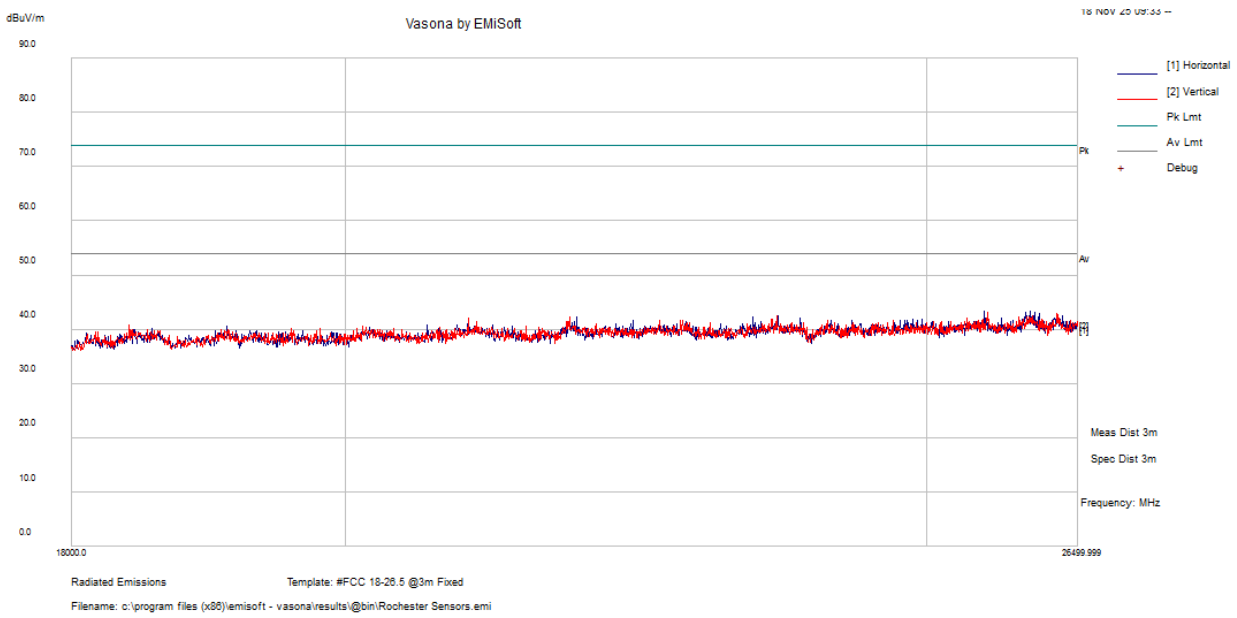


Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Polarity (H/V)	Antenna Height (cm)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Detector
4804.535	57.09	-0.03	57.06	V	102	336	74	-16.93	Peak
12008.77	46.34	10.44	56.77	V	109	278	74	-17.23	Peak
7205.245	52.49	3.14	55.63	V	107	193	74	-18.37	Peak
4804.535	48.83	-0.03	48.80	V	102	336	54	-5.19	Average
12008.77	36.21	10.44	46.65	V	109	278	54	-7.35	Average
7205.245	43.52	3.14	46.66	V	107	193	54	-7.34	Average

4) 18 GHz – 26.5 GHz, Measured at 3 meters

Note: Highest power is measured at 1Mbps and used as worst case configuration to show compliance for 18GHz to 26.5GHz.

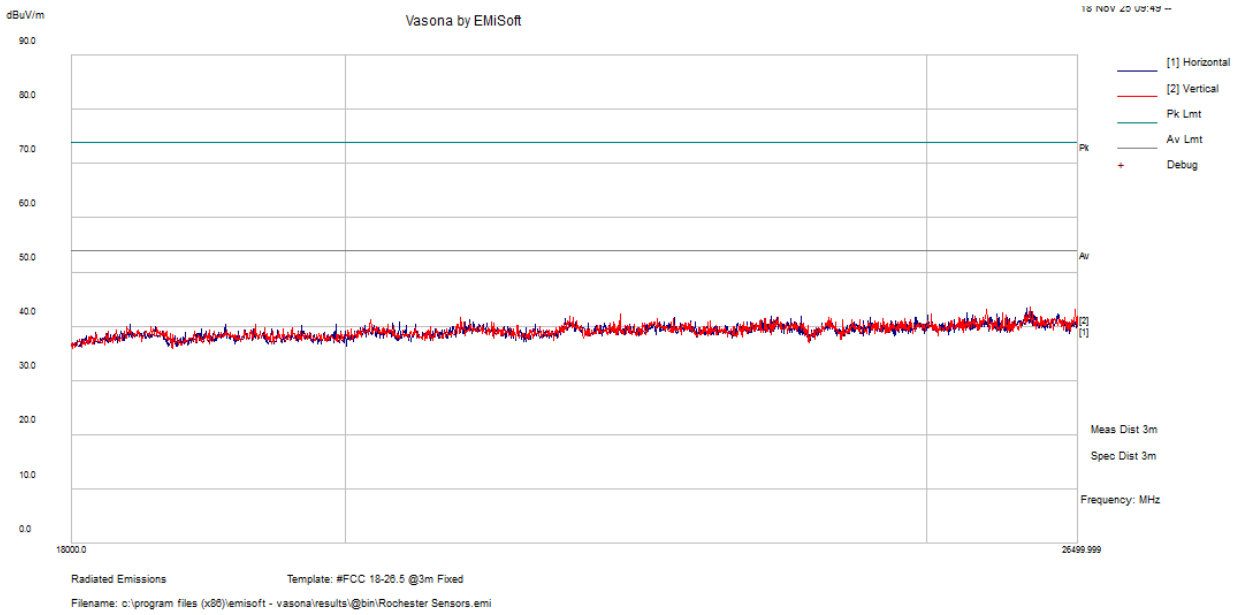
BLE (1Mbps), 2402 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Polarity (H/V)	Antenna Height (cm)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Detector
25583.52	41.1	4.3	36.8	H	15	0	54	-17.2	Peak

Note: Peak measurement is used to compare to the average limit.

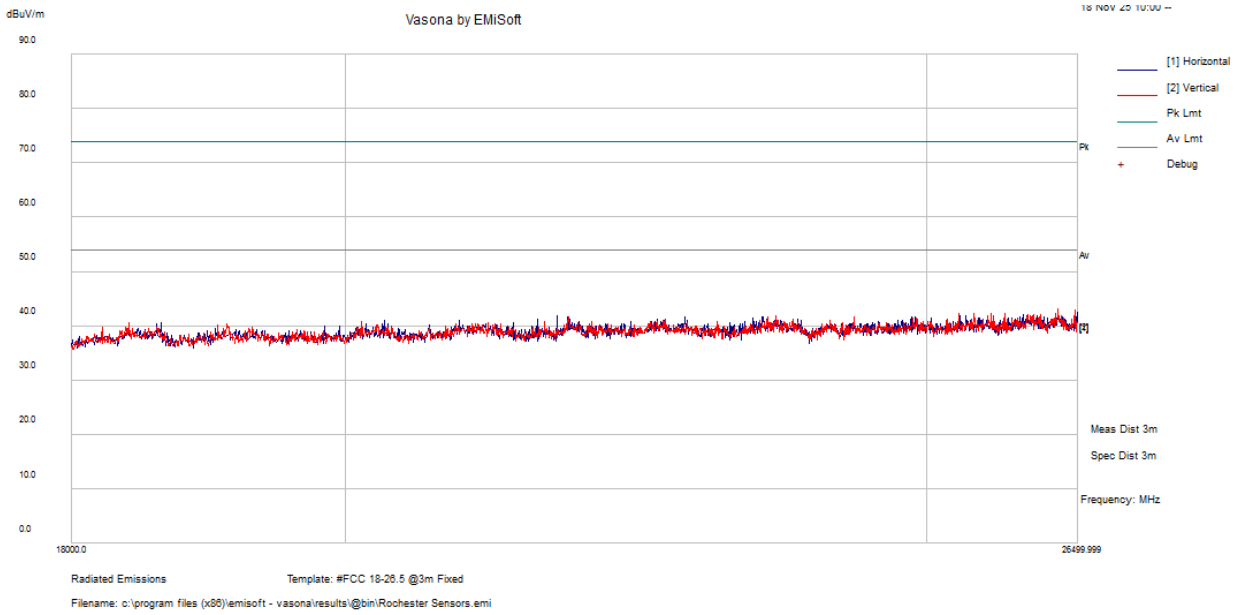
BLE (1Mbps), 2440 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Polarity (H/V)	Antenna Height (cm)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Detector
26052.837	41.6	5	36.6	V	190	9	54	-17.4	Peak

Note: Peak measurement is used to compare to the average limit.

BLE (1Mbps), 2480 MHz



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Polarity (H/V)	Antenna Height (cm)	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Detector
26321.239	40.7	4.8	35.9	V	193	11	54	-18.1	Peak

Note: Peak measurement is used to compare to the average limit.

7 FCC §15.247(a) (2) & ISEDC RSS-247 §6.3.1(a), RSS-Gen §6.7 – Emission Bandwidth

7.1 Applicable Standards

According to FCC §15.247(a) (2) and ISEDC RSS-247 §6.3.1(a): the minimum 6 dB bandwidth shall be 500 kHz.

7.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 8: DTS bandwidth.

As per ANSI C63.10 Clause 11.8: DTS bandwidth

One of the following procedures may be used to determine the modulated DTS bandwidth.

Option 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 × RBW].
c. Detector = peak.
d. Trace mode = max hold.
e. Sweep = auto couple.
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.

Option 2:

The automatic bandwidth measurement capability of an instrument may be employed using the X dB bandwidth mode with X set to 6 dB, if the functionality described in 11.8.1 (i.e., RBW = 100 kHz, VBW $\geqslant$ 3 $\times$ RBW, and peak detector with maximum hold) is implemented by the instrumentation function.
When using this capability, care shall be taken so that the bandwidth measurement is not influenced by any intermediate power nulls in the fundamental emission that might be $\geqslant$ 6 dB.

As per the ANSI C63.10-2020/Cor.1-2023 Clause 6.9.3: Occupied Bandwidth

The occupied bandwidth is the frequency bandwidth such that, below its lower and above its upper frequency limits, the mean powers are each equal to 0.5% of the total mean power of the given emission. The following procedure shall be used for measuring 99% power bandwidth:

a. The instrument center frequency is set to the nominal EUT channel center frequency. The frequency span for the spectrum analyzer shall be between 1.5 times and 5.0 times the OBW.
b. The nominal IF filter bandwidth (3 dB RBW) shall be in the range of 1% to 5% of the OBW, and VBW shall be approximately three times the RBW, unless otherwise specified by the applicable requirement.
c. Set the reference level of the instrument as required, keeping the signal from exceeding the maximum input mixer level for linear operation. In general, the peak of the spectral envelope shall be more than [10 log (OBW/RBW)] below the reference level. Specific guidance is given in 4.1.5.2.
d. Step a) through step c) might require iteration to adjust within the specified range.

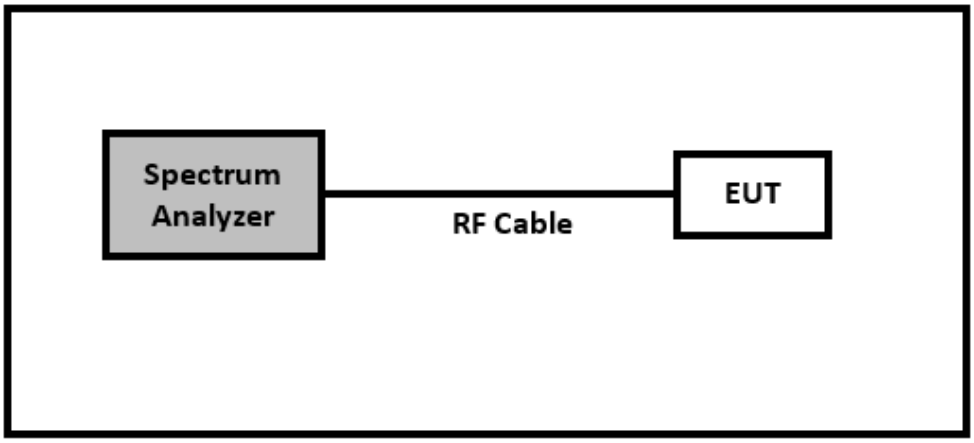
e. Video averaging is not permitted. Where practical, a sample detection and single sweep mode shall be used. Otherwise, peak detection and max hold mode (until the trace stabilizes) shall be used.

f. Use the 99% power bandwidth function of the instrument (if available) and report the measured bandwidth.

g. If the instrument does not have a 99% power bandwidth function, then the trace data points are recovered and directly summed in linear power terms. The recovered amplitude data points, beginning at the lowest frequency, are placed in a running sum until 0.5% of the total is reached; that frequency is recorded as the lower frequency. The process is repeated until 99.5% of the total is reached; that frequency is recorded as the upper frequency. The 99% power bandwidth is the difference between these two frequencies.

h. The occupied bandwidth shall be reported by providing plot(s) of the measuring instrument display; the plot axes and the scale units per division shall be clearly labeled. Tabular data may be reported in addition to the plot(s).

7.3 Test Setup Block Diagram



7.4 Test Equipment List and Details

BACL No	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
624	Agilent	Spectrum Analyzer	E4446A	MY48250238	2025-06-09	1 year
1116	UTiFLEX, MICRO-COAX	RF Cable	N/A	N/A	2025-07-01	6 months

Statement of Traceability: BACL Corp. *attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".*

7.5 Test Environmental Conditions

Temperature:	22ºC
Relative Humidity:	53%
ATM Pressure:	101.5 kPa

The testing was performed by Shankar Pangeni on 2025-11-14 at RF test site.

7.6 Test Results

2.4 GHz BLE

Channel	Frequency (MHz)	6 dB OBW (MHz)	99% OBW (MHz)	6 dB OBW Limit (kHz)	Result
1 Mbps					
Low	2402	0.6655	1.0197	≥ 500	Pass
Middle	2440	0.6883	1.0180	≥ 500	Pass
High	2480	0.6665	1.0127	≥ 500	Pass
2 Mbps					
Low	2402	1.126	2.0590	≥ 500	Pass
Middle	2440	1.150	2.0339	≥ 500	Pass
High	2480	1.109	2.0637	≥ 500	Pass

Please refer to Annex A for detailed test results.

8 FCC §15.247(b)(3) & ISEDC RSS-247 §6.3.2 – Maximum Output Power

8.1 Applicable Standards

According to FCC §15.247(b)(3): For systems using digital modulation in the 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz bands: 1 Watt. As an alternative to a peak power measurement, compliance with the one Watt limit can be based on a measurement of the maximum conducted output power. Maximum Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling 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 is transmitting at a reduced power level. If multiple modes of operation are possible (e.g., alternative modulation methods), the maximum conducted output power is the highest total transmit power occurring in any mode.

According to RSS-247 §6.3.2: For DTS operating in the band 2400-2483.5 MHz, the maximum peak conducted output power shall not exceed 1W, and the e.i.r.p. shall not exceed 4 W, except as provided in section 6.5 a) and b).

8.2 Measurement Procedure

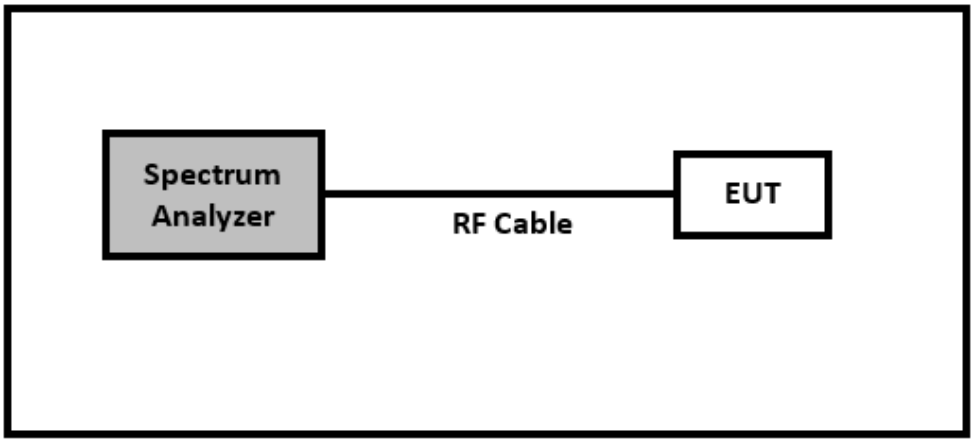
The measurements are based on ANSI C63.10-2020, Section 11.9.1.1

11.9.1.1 Maximum peak conducted output power RBW ≥ DTS bandwidth

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 × RBW].
c) Set span ≥ [3 × 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.

8.3 Test Setup Block Diagram



8.4 Test Equipment List and Details

BACL No	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
912	Rhode & Schwarz	Signal Analyzer	FSV40	1321.3008k39-101203-UW	2025-08-04	1 year
1116	UTiFLEX, MICRO-COAX	RF Cable	N/A	N/A	2025-07-01	6 months

Statement of Traceability: BACL Corp. *attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".*

8.5 Test Environmental Conditions

Temperature:	22ºC
Relative Humidity:	53%
ATM Pressure:	101.5 kPa

The testing was performed by Shankar Pangeni on 2025-11-13 at RF test site.

8.6 Test Results

2.4 GHz BLE

Channel	Frequency (MHz)	Antenna Gain (dBi)	Conducted Output Power (dBm)	Output Power Limit (dBm)	EIRP (dBm)	EIRP Limit (dBm)	Result
1Mbps							
Low	2402	1.45	-2.04	30	-0.59	<36	Pass
Middle	2440	1.45	-1.96	30	-0.51	<36	Pass
High	2480	1.45	-2.05	30	-0.60	<36	Pass
2Mbps							
Low	2402	1.45	-2.04	30	-0.59	<36	Pass
Middle	2440	1.45	-1.98	30	-0.53	<36	Pass
High	2480	1.45	-2.23	30	-0.78	<36	Pass

Note: EIRP [dBm] = Conducted Output Power [dBm]+Antenna Gain [dBi]
Note: For eirp limit, dBm=10log(Power[mW]/1mW)=10log(4000mW/1mW)=36dBm

Please refer to Annex B for detailed test results.

9 FCC §15.247(e) & ISEDC RSS-247 §6.3.1(b) –Power Spectral Density

9.1 Applicable Standards

According to ECFR §15.247(e) and RSS-247 §6.3.1 (b), for digitally modulated systems, the power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

9.2 Measurement Procedure

The measurements are based on FCC KDB 558074 D01 DTS Meas Guidance v05r02: Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under §15.247 section 8.4: Maximum power spectral density level in the fundamental emission.

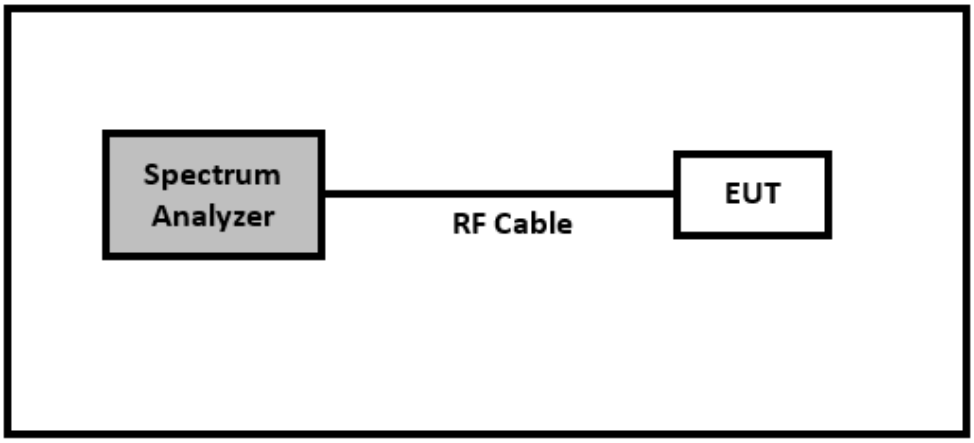
As per ANSI C63.10 Clause 11.10: Maximum power spectral density level in the fundamental emission

Some regulatory requirements specify a conducted PSD limit within the DTS bandwidth during any time interval of continuous transmission.88 Such specifications require that the same method as used to determine the conducted output power shall be used to determine the power spectral density. If maximum peak conducted output power was measured, then the peak PSD procedure 11.10.2 (method PKPSD) shall be used. If maximum conducted output power was measured, then one of the average PSD procedures shall be used, as applicable based on the following criteria (the peak PSD procedure is also an acceptable option):

Method PKPSD (peak PSD): The following procedure shall be used if maximum peak conducted output power was used to determine compliance, and it is optional if the maximum conducted (average) output power was used to determine compliance:

a. Set analyzer center frequency to DTS channel center frequency.
b. Set the span to 1.5 times the DTS bandwidth.
c. Set the RBW to 3 kHz ≤ RBW ≤ 100 kHz.
d. Set the VBW ≥ [3 × RBW].
e. Detector = peak.
f. Sweep time = auto couple.
g. Trace mode = max hold.
h. Allow trace to fully stabilize.
i. Use the peak marker function to determine the maximum amplitude level within the RBW.
j. If measured value exceeds requirement, then reduce RBW (but no less than 3 kHz) and repeat.

9.3 Test Setup Block Diagram



9.4 Test Equipment List and Details

BACL No	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
624	Agilent	Spectrum Analyzer	E4446A	MY48250238	2025-06-09	1 year
1116	UTiFLEX, MICRO-COAX	RF Cable	N/A	N/A	2025-07-01	6 months
912	Rhode & Schwarz	Signal Analyzer	FSV40	1321.3008k39-101203-UW	2025-08-04	1 year

Statement of Traceability: BACL Corp. *attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".*

9.5 Test Environmental Conditions

Temperature:	22ºC
Relative Humidity:	53%
ATM Pressure:	101.5 kPa

The testing was performed by Shankar Pangeni on 2025-11-14 and 2025-11-21 at RF test site.

9.6 Test Results

2.4 GHz BLE

Channel	Frequency (MHz)	PSD (dBm/10kHz)	Limit (dBm/3kHz)
1Mbps			
Low	2402	-7.53	<8
Middle	2440	-7.24	<8
High	2480	-7.43	<8
2Mbps			
Low	2402	-7.59	<8
Middle	2440	-7.66	<8
High	2480	-8.33	<8

Note: The EUT passed with stringent RBW of 10 kHz, thus complied with FCC and IC RBW requirement of 3 kHz.

Please refer to Annex C for detailed test results.

10 FCC §15.247(d) & ISEDC RSS-247 §6.6 – Spurious Emissions at Antenna Terminal and 100 kHz Band Edges

10.1 Applicable Standards

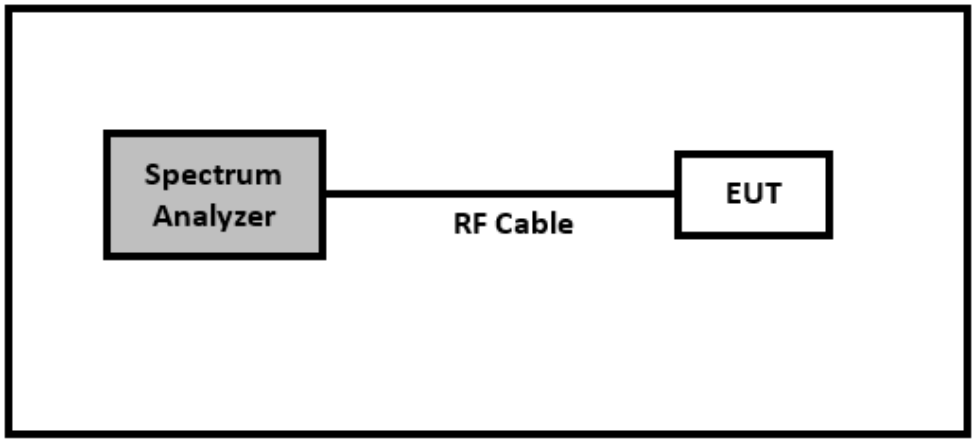
According to FCC §15.247(d), in any 100 kHz bandwidth outside the frequency bands in which the spread spectrum intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emissions limits specified in §15.209(a) see §15.205(c).

According to ISEDC RSS-247 §6.6, in any 100 kHz bandwidth outside the frequency band in which the spread spectrum device, digitally modulated device, or hybrid system 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 6.3.2, the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

10.2 Measurement Procedure

Span = wide enough to capture the peak level of the emission operating on the channel closest to the band edge, as well as any modulation products which fall outside of the authorized band of operation.
RBW = 100 kHz
VBW = 300 kHz
Sweep = coupled
Detector function = peak
Trace = max hold

10.3 Test Setup Block Diagram



10.4 Test Equipment List and Details

BACL No	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
624	Agilent	Spectrum Analyzer	E4446A	MY48250238	2025-06-09	1 year
1116	UTiFLEX, MICRO-COAX	RF Cable	N/A	N/A	2025-07-01	6 months

Statement of Traceability: BACL Corp. *attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".*

10.5 Test Environmental Conditions

Temperature:	22ºC
Relative Humidity:	53%
ATM Pressure:	101.5 kPa

The testing was performed by Shankar Pangeni on 2025-11-14 at RF test site.

10.6 Test Results

Please refer to Annex D

Test Results: Pass

11 Appendix A (Normative) – EUT Test Setup Photographs

Please refer to the attachment.

12 Appendix B (Normative) – EUT External Photographs

Please refer to the attachment.

13 Appendix C (Normative) – EUT Internal Photographs

Please refer to the attachment.

14 Appendix D (Normative) – A2LA Electrical Testing Certificate

Accredited Laboratory

A2LA has accredited

BAY AREA COMPLIANCE LABORATORIES CORP.

Sunnyvale, CA

for technical competence in the field of

Electrical Testing

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017 *General requirements for the competence of testing and calibration laboratories*. This laboratory also meets A2LA R222 - Specific Requirements EPA ENERGY STAR Accreditation Program. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (*refer to joint ISO-ILAC-IAF Communiqué dated April 2017*).

Presented this 13th day of September 2024.

Mr. Trace McInturff, Vice President, Accreditation Services
For the Accreditation Council
Certificate Number 3297.02
Valid to September 30, 2026

For the tests to which this accreditation applies, please refer to the laboratory's Electrical Scope of Accreditation.

Please follow the web link below for a full ISO 17025 scope.

https://www.a2la.org/scopepdf/3297-02.pdf

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