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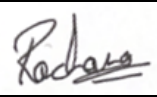
TEST REPORT

For

Fox Factory Inc.

2055 Sugarloaf Cir Suite 300
Duluth, Georgia, United States 30097

FCC ID: 2BEYR820-09-166
IC: 32095-82009166

Report Type: Class II Permissive Change (FCC) Class IV Permissive Change (IC)	Product Type: Radio Module
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* 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 "*"

TABLE OF CONTENTS

1	GENERAL DESCRIPTION	4
1.1	PRODUCT DESCRIPTION FOR EQUIPMENT UNDER TEST (EUT)	4
1.2	MECHANICAL DESCRIPTION OF EUT	4
1.3	OBJECTIVE	5
1.4	RELATED SUBMITTAL(S)/GRANT(S).....	6
1.5	TEST METHODOLOGY	6
1.6	MEASUREMENT UNCERTAINTY	6
1.7	TEST FACILITY REGISTRATIONS.....	6
1.8	TEST FACILITY ACCREDITATIONS	7
2	SYSTEM TEST CONFIGURATION	11
2.1	JUSTIFICATION	11
2.2	EUT EXERCISE SOFTWARE	11
2.3	EQUIPMENT MODIFICATION	11
2.4	LOCAL SUPPORT EQUIPMENT.....	11
2.5	REMOTE SUPPORT EQUIPMENT	12
2.6	POWER SUPPLY AND LINE FILTERS	12
2.7	INTERFACE PORTS AND CABLING.....	12
3	SUMMARY OF TEST RESULTS.....	13
4	FCC §2.1093, FCC §15.247(I) & ISEDC RSS-102 – RF EXPOSURE	14
4.1	APPLICABLE STANDARDS	14
4.2	FCC EXEMPTION	19
4.3	IC EXEMPTION	20
5	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	21
5.1	APPLICABLE STANDARDS	21
5.2	TEST SETUP.....	24
5.3	TEST PROCEDURE	24
5.4	CORRECTED AMPLITUDE AND MARGIN CALCULATION	25
5.5	TEST SETUP BLOCK DIAGRAM.....	26
5.6	TEST EQUIPMENT LIST AND DETAILS.....	27
5.7	TEST ENVIRONMENTAL CONDITIONS	27
5.8	SUMMARY OF TEST RESULTS	28
5.9	RADIATED EMISSIONS TEST RESULTS.....	29
6	APPENDIX A (NORMATIVE) – EUT TEST SETUP PHOTOGRAPHS.....	39
7	APPENDIX B (NORMATIVE) – EUT EXTERNAL PHOTOGRAPHS.....	40
8	APPENDIX C (NORMATIVE) – EUT INTERNAL PHOTOGRAPHS	41
9	APPENDIX D (NORMATIVE) – A2LA ELECTRICAL TESTING CERTIFICATE.....	42

DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R2511197-247	Class II Permissive Change (FCC) Class IV Permissive Change (IC) Report	2026-02-04

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test report is prepared on behalf of *Fox Factory Inc.*, and their product model: Live Valve Neo E-Optimized (820-09-166), FCC ID: 2BEYR820-09-166, IC: 32095-82009166, the “EUT” as referred to in this report. The EUT is a radio module with BLE capabilities operating in 2402 MHz to 2480 MHz. The EUT was installed into host device bicycle suspension, model: rear shock. The host device contains two radio modules: Live Valve Neo E-Optimized (820-09-166), BMD-350.

Model Number	Live Valve Neo E-Optimized (820-09-166)
FCC ID	2BEYR820-09-166
IC	32095-82009166
HVIN	Live Valve Neo E-Optimized (820-09-166)
Operating Frequency	2402 MHz – 2480 MHz
Modulation	GFSK
Data Rates	1 Mbps, 2 Mbps
Antenna Gain	Live Valve Neo E-Optimized (820-09-166): -1dBi

Radio Module	BMD-350
FCC ID	2AA9B05
IC	12208A-05
Operating Frequency	BLE: 2402 MHz – 2480 MHz
Modulation	GFSK
Data Rates	1 Mbps
Antenna Type	Ceramic chip
Antenna Gain	BMD-350: 1dBi

1.2 Mechanical Description of EUT

The EUT measures approximately 230 mm (L) x 100 mm (W) x 50 mm (H) and weighs approximately 0.8 kg.

The data gathered was from a production sample provided by Fox Factory Inc. with S/N: P1254690-0013-T

1.3 Objective

This report is prepared on behalf of *Fox Factory Inc.* in accordance with Part 2, Subpart J, and Part 15, Subpart C of the Federal Communication Commission's rules and ISED RSS-247 Issue 4, July 2025.

The objective is to determine compliance with FCC Part 15.247 and ISED RSS-247 for RF Exposure and Radiated Spurious Emissions.

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)

None.

1.5 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2020+Cor. 1-2023+C63.10a-2024 + Errata to C63.10a-2024, 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	±1.48dB
Unwanted Emissions, conducted	±1.57dB
All emissions, radiated	±4.0 dB
AC power line Conducted Emission	±2.0 dB
Temperature	±2 ° C
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 Industry Canada 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):
 - All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
 - All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
 - All Telephone Terminal Equipment within FCC Scope C.
2. Canada (ISED Canada) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II:
 - Phase I Designation Letter
 - 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:
 - All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2 IMDA Phase I
 - 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:
 - NIST Phase I Scope Recognition Letter from OFCA for BACL –US0057
 - OFCA Phase II Designation Letter
5. For Japan (Ministry of Communications):
 - NIST Japan Recognition
 - MIC Telecommunication Business Law (Terminal Equipment):
 1. All Scope A1 – Terminal Equipment for the Purpose of Calls;
 2. All Scope A2 – Other Terminal Equipment
 - 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
 - Japan VCCI – Voluntary Control Council for Interference US-Japan Telecom Treaty (VCCI Side Letter)
 1. VCCI Certificate
 - Japan Registered Certification Body
 1. RCB Recognition Letter

6. European Union:
 - Radio Equipment Directive [RED] 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
 - 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:
 - Phase I Designation Letter
8. Chinese Taipei (Republic of China – Taiwan):
 - NCC (National Communications Commission) APEC Tel MRA -Phase I
9. Republic of Korea (Ministry of Communications – Radio Research Laboratory) APEC Tel MRA -Phase I:
 - NIST Phase I Scope Update Notification Letter from Korea for BACL
10. Vietnam APEC Tel MRA -Phase I (page 13)
 - Vietnam (MIC) NIST Phase I Scope
11. Indonesia SDPPI (page 6)
 - Phase I Listing
12. Israel Phase I
 - 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
 - NIST Phase I New Recognition Letter from Mexico for BACL – US0057
15. Taiwan (BSMI) Phase 1 Designation Letter and designation form.
 - NIST Phase I Scope Update Designation Letter to BSMI for BACL – US0057
 - 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 C63.10-2020+Cor. 1-2023+C63.10a-2024 + Errata to C63.10a-2024 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 “*nRF Connect for Desktop v.5.2.1.0*”, provided by Fox Factory Inc. The software is compliant with the standard requirements being tested against.

Radio	Mode		Channel	Frequency (MHz)	Power Setting	
	BMD-350	Live Valve Neo E-Optimized (820-09-166)			BMD-350	Live Valve Neo E-Optimized (820-09-166)
BLE	1Mbps	2Mbps	Middle	2440	4	8

2.3 Equipment Modification

No modifications were made to the EUT during testing.

2.4 Local Support Equipment

Manufacturer	Description	Model	Serial Number
Dell	Laptop	Latitude E6410	-

2.5 Remote Support Equipment

None.

2.6 Power Supply and Line Filters

Manufacturer	Description	Model	Serial Number
TRIAD	AC Power Adapter	836WSU120-3000	WSU120-3000

Note: EUT is powered by battery only. AC Power adapter was used for testing.

2.7 Interface Ports and Cabling

Cable Description	Length (m)	From	To
Power Cable	2	AC Power Adapter	EUT
USB (2x)	<1	EUT	Laptop

3 Summary of Test Results

FCC & ISEDC Rules	Description of Test	Results
FCC §2.1093, §15.247(i) ISEDC RSS-102	RF Exposure	Compliant
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

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 §2.1093, FCC §15.247(i) & ISEDC RSS-102 – RF Exposure

4.1 Applicable Standards

According to FCC KDB 447498 D01 General RF Exposure Guidance v06 Section 4.3.1, Unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition, listed below, is satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions. The minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander (see 5) of section 4.1). To qualify for SAR test exclusion, the test separation distances applied must be fully explained and justified by the operating configurations and exposure conditions of the transmitter and applicable host platform requirements, typically in the SAR measurement or SAR analysis report, according to the required published RF exposure KDB procedures. When no other RF exposure testing or reporting is required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for the SAR test exclusion. When required, the device specific conditions described in the other published RF exposure KDB procedures must be satisfied before applying these SAR test exclusion provisions; for example, handheld PTT two-way radios, handsets, laptops & tablets etc.

- 1) The 1-g and 10-g SAR test exclusion thresholds for 100 MHz to 6 GHz at test separation distances ≤ 50 mm are determined by:

$$\left[\frac{(\text{max. power of channel, including tune-up tolerance, mW})}{(\text{min. test separation distance, mm})} \right] \cdot \sqrt{f(\text{GHz})} \leq 3.0 \text{ for 1-g SAR and } \leq 7.5 \text{ for 10-g extremity SAR, where}$$

- f (GHz) is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison
- 3.0 and 7.5 are referred to as the numeric thresholds in the step 2 below

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm according to 5) in section 4.1 is applied to determine SAR test exclusion.

- 2) At 100 MHz to 6 GHz and for test separation distances > 50 mm, the SAR test exclusion threshold is determined according to the following, and as illustrated in Appendix B:
- a) [Power allowed at numeric threshold for 50 mm in step 1) + (test separation distance - 50 mm) $\cdot$ ($f(\text{MHz})/150$)] mW, at 100 MHz to 1500 MHz
 - b) [Power allowed at numeric threshold for 50 mm in step 1) + (test separation distance - 50 mm) $\cdot$ 10] mW at > 1500 MHz and ≤ 6 GHz
- 3) At frequencies below 100 MHz, the following may be considered for SAR test exclusion, and as illustrated in Appendix C:
- a) The power threshold at the corresponding test separation distance at 100 MHz in step 2) is multiplied by $[1 + \log(100/f(\text{MHz}))]$ for test separation distances > 50 mm and < 200 mm
 - b) The power threshold determined by the equation in a) for 50 mm and 100 MHz is multiplied by $\frac{1}{2}$ for test separation distances ≤ 50 mm

- c) SAR measurement procedures are not established below 100 MHz. When SAR test exclusion cannot be applied, a KDB inquiry is required to determine SAR evaluation requirements for any test results to be acceptable.

Test exclusion is applied to the required test channels on a channel by channel basis.

When SAR evaluation is required by the hotspot mode or UMPC mini-tablet procedures, that is, where an antenna is ≤ 2.5 cm from a surface or edge, the test separation distance from the phantom to the antenna or device enclosure, as appropriate, should be applied to determine further SAR test exclusion according to the criteria in this document. Do not use the antenna to device surface or edge distance.

This is equivalent to the formula written as: $[(\text{max. power of channel, including tune-up tolerance, mW}) / (60 \sqrt{f(\text{GHz}) \text{ mW}})] \cdot [20 \text{ mm} / (\text{min. test separation distance, mm})] \leq 1.0$ for 1-g SAR; also see Appendix A for approximate exclusion threshold numerical values at selected frequencies and distances.

Appendix A

SAR Test Exclusion Thresholds for 100 MHz – 6 GHz and ≤ 50 mm

Approximate SAR Test Exclusion Power Thresholds at Selected Frequencies and Test Separation Distances are illustrated in the following Table. The equation and threshold in 4.3.1 must be applied to determine SAR test exclusion.

MHz	5	10	15	20	25	mm
150	39	77	116	155	194	<i>SAR Test Exclusion Threshold (mW)</i>
300	27	55	82	110	137	
450	22	45	67	89	112	
835	16	33	49	66	82	
900	16	32	47	63	79	
1500	12	24	37	49	61	
1900	11	22	33	44	54	
2450	10	19	29	38	48	
3600	8	16	24	32	40	
5200	7	13	20	26	33	
5400	6	13	19	26	32	
5800	6	12	19	25	31	
MHz	30	35	40	45	50	mm
150	232	271	310	349	387	<i>SAR Test Exclusion Threshold (mW)</i>
300	164	192	219	246	274	
450	134	157	179	201	224	
835	98	115	131	148	164	
900	95	111	126	142	158	
1500	73	86	98	110	122	
1900	65	76	87	98	109	
2450	57	67	77	86	96	
3600	47	55	63	71	79	
5200	39	46	53	59	66	
5400	39	45	52	58	65	
5800	37	44	50	56	62	

Note: 10-g Extremity SAR Test Exclusion Power Thresholds are 2.5 times higher than the 1-g *SAR Test Exclusion Thresholds* indicated above. These thresholds do not apply, by extrapolation or other means, to occupational exposure limits.

According to FCC KDB 447498 D01 General RF Exposure Guidance v06 Section 4.3.2 (b)

When an antenna qualifies for the standalone SAR test exclusion of 4.3.1 and also transmits simultaneously with other antennas, the standalone SAR value must be estimated according to the following to determine the simultaneous transmission SAR test exclusion criteria;

1) $[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f(\text{GHz})}/x] \text{ W/kg}$, for test separation distances $\leq 50 \text{ mm}$;
where $x = 7.5$ for 1-g SAR and $x = 18.75$ for 10-g SAR.

2) 0.4 W/kg for 1-g SAR and 1.0 W/kg for 10-g SAR, when the test separation distance is $> 50 \text{ mm}$.

This SAR estimation formula has been considered in conjunction with the SAR Test Exclusion Thresholds to result in substantially conservative SAR values of $\leq 0.4 \text{ W/kg}$. When SAR is estimated, the peak SAR location is assumed to be at the feed-point or geometric center of the antenna, whichever provides a smaller antenna separation distance, and this location must be clearly identified in test reports. The estimated SAR is used only to determine simultaneous transmission SAR test exclusion; it should not be reported as the standalone SAR. When SAR is estimated, it must be applied to determine the sum of 1-g SAR test exclusion. When SAR to peak location separation ratio test exclusion is applied, the highest reported SAR for simultaneous transmission can be an estimated standalone SAR if the estimated SAR is the highest among the simultaneously transmitting antennas

(see also KDB Publication 690783 D01). For situations where the estimated SAR is overly conservative for certain conditions, the test lab may choose to perform standalone SAR measurements, then use the measured SAR to determine simultaneous transmission SAR test exclusion. Estimated SAR values at selected frequencies, distances, and power levels are illustrated in Appendix D.

According to ISED RSS-102 Issue 6 Section 6.3: SAR exemption limits for routine evaluations

Devices operating at or below the applicable output power levels (adjusted for tune-up tolerance) specified in table 11, based on the separation distance, are exempt from SAR evaluation. The separation distance, defined as the distance between the user and/or bystander and the antenna and/or radiating element of the device or the outer surface of the device, shall be less than or equal to 20 cm for these exemption limits to apply.

Table 11: Power limits for exemption from routine SAR evaluation based on the separation distance

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of ≤ 5 mm	At separation distance of 10 mm	At separation distance of 15 mm	At separation distance of 20 mm	At separation distance of 25 mm
≤ 300	45	116	139	163	189
450	32	71	87	104	124
835	21	32	41	54	72
1900	6	10	18	33	57
2450	3	7	16	32	56
3500	2	6	15	29	50
5800	1	5	13	23	32

Frequency (MHz)	Exemption Limits (mW)				
	At separation distance of 30 mm	At separation distance of 35 mm	At separation distance of 40 mm	At separation distance of 45 mm	At separation distance of ≥ 50 mm
≤ 300	216	246	280	319	362
450	147	175	208	248	296
835	96	129	172	228	298
1900	92	138	194	257	323
2450	89	128	170	209	245
3500	72	94	114	134	158
5800	41	54	74	102	128

The exemption limits in table 11 Table 11 are based on measurements and simulations of half-wave dipole antennas at separation distances of 5 mm to 50 mm from a flat phantom, which provides a SAR value of approximately 0.4 W/kg for 1 g of tissue.

For limb-worn devices where the 10 gram of tissue applies, the exemption limits for routine evaluation in table 11 are multiplied by a factor of 2.5.

For controlled-use devices where the 8 W/kg for 1 gram of tissue applies, the exemption limits for routine evaluation in table 11 Table 11 are multiplied by a factor of 5.

When the operating frequency of the device is between two frequencies located in table 11, linear interpolation shall be applied for the applicable separation distance. If the separation distance of the device is between two distances located in table 11, linear interpolation may be applied for the applicable frequency. Alternatively, the limit corresponding to the smaller distance may be employed. For example, in case of a 7 mm separation

distance, either use the exception value for a 5 mm separation distance or interpolate between the limits corresponding to 5 mm and 10 mm separation distances.

For implanted medical devices, the exemption limit for routine SAR evaluation is set at an output power of 1 mW, regardless of frequency.

The SAR levels from exempted transmitters shall be included in the compliance assessment and the determination of the TER. Detailed guidance is included in sections 7.1.8 and 8.2.2.1.

4.2 FCC Exemption

BMD-350 (FCC ID: 2AA9B05)

<u>Maximum output power at antenna input terminal (dBm):</u>	<u>-3.87</u>
<u>Maximum output power including tune-up tolerance (dBm):</u>	<u>-2.87</u>
<u>Maximum output power including tune-up tolerance (mW):</u>	<u>0.5164</u>
<u>Transmit frequency (GHz):</u>	<u>2.480</u>
<u>Minimum test separation distance (mm):</u>	<u>5</u>
<u>Calculated SAR test exclusion threshold:</u>	<u>0.163</u>
<u>SAR test exclusion threshold limit:</u>	<u>≤ 3</u>

The device is compliant with the SAR test exclusion threshold limit. The maximum SAR test exclusion threshold calculated is 0.163. Limit is ≤ 3 .

Live Valve Neo E-Optimized (820-09-166) (FCC ID: 2BEYR820-09-166)

<u>Maximum output power at antenna input terminal (dBm):</u>	<u>0.541</u>
<u>Maximum output power including tune-up tolerance (dBm):</u>	<u>1.541</u>
<u>Maximum output power including tune-up tolerance (mW):</u>	<u>1.426</u>
<u>Transmit frequency (GHz):</u>	<u>2.480</u>
<u>Minimum test separation distance (mm):</u>	<u>5</u>
<u>Calculated SAR test exclusion threshold:</u>	<u>0.449</u>
<u>SAR test exclusion threshold limit:</u>	<u>≤ 3</u>

The device is compliant with the SAR test exclusion threshold limit. The maximum SAR test exclusion threshold calculated is 0.449. Limit is ≤ 3 .

Simultaneous transmission Calculation:

BMD-350 (FCC ID: 2AA9B05)

<u>Maximum output power at antenna input terminal (dBm):</u>	<u>-3.87</u>
<u>Maximum output power including tune-up tolerance (dBm):</u>	<u>-2.87</u>
<u>Maximum output power including tune-up tolerance (mW):</u>	<u>0.5164</u>
<u>Transmit frequency (GHz):</u>	<u>2.480</u>
<u>Minimum test separation distance (mm):</u>	<u>5</u>
<u>Calculated SAR (W/kg):</u>	<u>0.0217</u>
<u>SAR limit (W/kg):</u>	<u>≤ 0.4</u>

Live Valve Neo E-Optimized (820-09-166) (FCC ID: 2BEYR820-09-166)

<u>Maximum output power at antenna input terminal (dBm):</u>	<u>0.541</u>
<u>Maximum output power including tune-up tolerance (dBm):</u>	<u>1.541</u>
<u>Maximum output power including tune-up tolerance (mW):</u>	<u>1.426</u>
<u>Transmit frequency (GHz):</u>	<u>2.480</u>
<u>Minimum test separation distance (mm):</u>	<u>5</u>
<u>Calculated SAR (W/kg):</u>	<u>0.0599</u>
<u>SAR (W/kg):</u>	<u>≤ 0.4</u>

Simultaneous transmission

BMD-350 + Live Valve Neo E-Optimized (820-09-166): $0.0217 + 0.0599 = 0.0816$ W/kg

The device is compliant with the SAR test exclusion threshold limit. The maximum SAR test exclusion threshold calculated is 0.0816 W/kg. Limit is ≤ 0.4 W/kg.

4.3 IC Exemption**BMD-350 (IC: 12208A-05)**

Maximum Output power = -3.87 dBm

Maximum output power including tune-up tolerance = -2.87 dBm

Maximum EIRP power = -2.87 dBm + 1 dBi = -1.87 dBm (0.650 mW) which is less than the exemption threshold, i.e., 4.77 dBm (3mW).

Therefore, the SAR evaluation is exempt

Note: Separation distance of ≤ 5 mm used for exemption limit.

Live Valve Neo E-Optimized (820-09-166) (IC: 32095-82009166)

Maximum Output power = 0.541 dBm

Maximum output power including tune-up tolerance = 1.541 dBm

Maximum EIRP power = 1.541 dBm - 1 dBi = 0.541 dBm (1.133 mW) which is less than the exemption threshold, i.e., 4.77dBm (3mW).

Therefore, the SAR evaluation is exempt

Note: Separation distance of ≤ 5 mm used for exemption limit.

Simultaneous transmission

BMD-350 + Live Valve Neo E-Optimized (820-09-166) = $0.650 + 1.133 = 1.783$ mW, which is less than the exemption threshold, i.e., 3mW.

Therefore, the SAR evaluation is exempt

5 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

5.1 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	16.42 – 16.423	960 – 1240	4.5 – 5.15
0.495 – 0.505	16.69475 – 16.69525	1300 – 1427	5.35 – 5.46
2.1735 – 2.1905	25.5 – 25.67	1435 – 1626.5	7.25 – 7.75
4.125 – 4.128	37.5 – 38.25	1645.5 – 1646.5	8.025 – 8.5
4.17725 – 4.17775	73 – 74.6	1660 – 1710	9.0 – 9.2
4.20725 – 4.20775	74.8 – 75.2	1718.8 – 1722.2	9.3 – 9.5
6.215 – 6.218	108 – 121.94	2200 – 2300	10.6 – 12.7
6.26775 – 6.26825	123 – 138	2310 – 2390	13.25 – 13.4
6.31175 – 6.31225	149.9 – 150.05	2483.5 – 2500	14.47 – 14.5
8.291 – 8.294	156.52475 – 156.52525	2690 – 2900	15.35 – 16.2
8.362 – 8.366	156.7 – 156.9	3260 – 3267	17.7 – 21.4
8.37625 – 8.38675	162.0125 – 167.17	3.332 – 3.339	22.01 – 23.12
8.41425 – 8.41475	167.72 – 173.2	3.3458 – 3.358	23.6 – 24.0
12.29 – 12.293	240 – 285	3.600 – 4.400	31.2 – 31.8
12.51975 – 12.52025	322 – 335.4		36.43 – 36.5
12.57675 – 12.57725	399.9 – 410		Above 38.6
13.36 – 13.41	608 – 614		

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 ISED 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 ISED 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 ISED 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.

5.2 Test Setup

The radiated emissions tests were performed in the 5-meter chamber, using the setup in accordance with ANSI C63.10. The specification used was the FCC §15.247 and ISED 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.

5.3 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 to 150 kHz:

RBW = 200 Hz / VBW = 1 kHz / Sweep = Auto

150 kHz to 30 MHz:

RBW = 9 kHz / VBW = 30 kHz / Sweep = Auto

30MHz to 1000 MHz:

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

Above 1000 MHz (RSE):

(1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto

(2) Average: RBW = 1MHz / VBW = 3MHz / Sweep = Auto / Trace averaging for 100 traces

5.4 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:

$$CA = \text{S.A. Reading} + \text{Correction Factor}$$

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:

$$\text{Correction Factor} = AF + CL + \text{Atten} - Ga$$

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:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

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:

$$CA = Ai + AF + CL + \text{Atten} - Ga$$

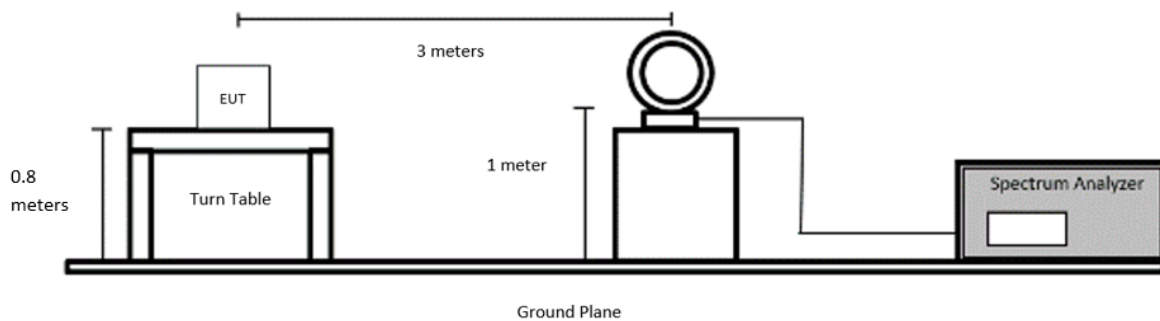
For example, a corrected amplitude of 40.3 dBuV/m = Indicated Reading (32.5 dBuV) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

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:

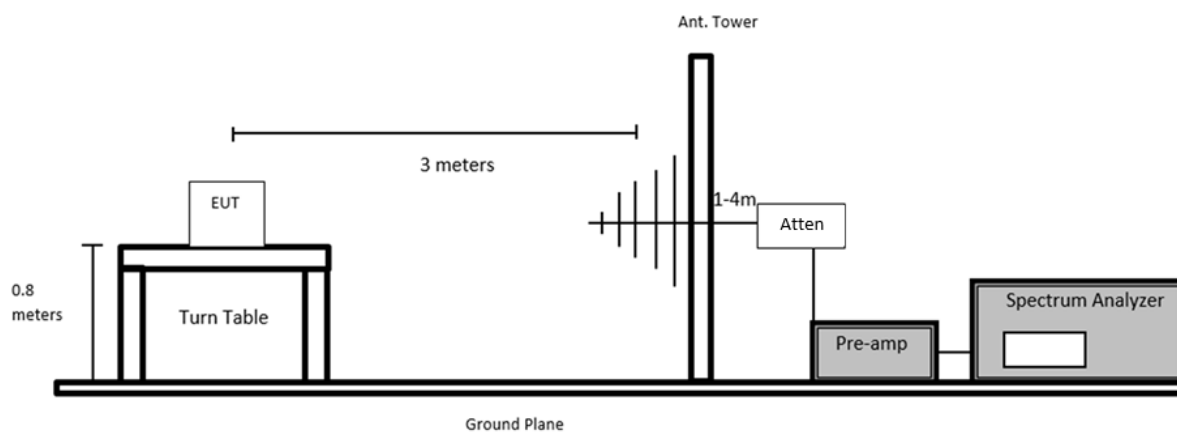
$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

5.5 Test Setup Block Diagram

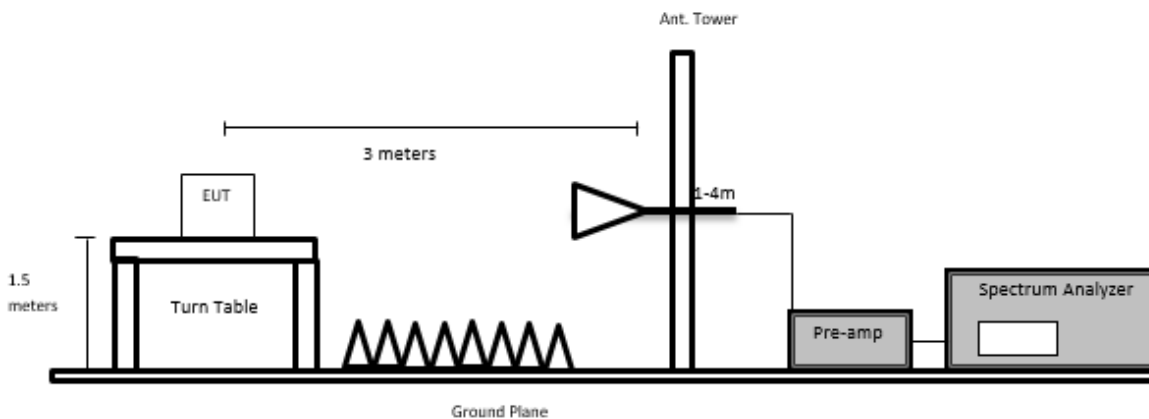
9 kHz to 30 MHz



30 MHz to 1 GHz



Above 1 GHz



5.6 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
1427	Keysight Technologies	PXE EMI Receiver	N9048B	MY59500006	2026-01-14	1 year
316	Sonoma Instruments	Preamplifier 10 kHz - 2.5 GHz	317	260406	2025-11-12	6 months
321	Sunol Sciences	Biconilog Antenna	JB3	A020106-2; 1504	2025-12-16	2 years
1245	Pasternack	6dB Attenuator	PE7390-6	01182018A	2025-12-16	2 years
1246	Hewlet Packard	RF Limiter	11867A	01734	2025-09-09	6 months
1248	Pasternack	RG214 COAX Cable	PE3062	-	2025-10-03	6 months
1210	Pasternack	N-type Coax Cable, 50ft RG213	PE3496-0600	2103161	2025-11-12	6 months
1192	ETS Lindgren	Horn Antenna	3117	00218973	2024-10-23	2 years
1295	Carlisle	10m Ultra Low Loss Coaxial Cable	UFB142A-1-3937-200200	64639890912-001	2025-10-16	6 months
393	Com-Power	Loop Antenna, Active 9KHz-30MHz	AL-130	17043	2025-05-06	2 years
90	Wisewave	Horn Antenna 18-26.5GHz	ARH-4223-02	10555-01	2025-05-06	2 years
1449	BACL	Preamplifier 100MHz-18GHz	BACL1313-A100M18G	4052472	2025-08-18	6 months
1451	BACL	Preamplifier 18-40GHz	BACL-1313-A1840	4052432	2025-08-18	6 months
1334	Micro-Tronics	Notch Filter 2.4 GHz	BRM50702	G361	2025-12-17	1 year
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

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".

5.7 Test Environmental Conditions

Temperature:	19° C
Relative Humidity:	48 %
ATM Pressure:	101.4 kPa

The testing was performed by Michael Papa from 2026-01-23 to 2026-01-26 in 5m chamber 3.

5.8 Summary of Test Results

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

Worst Case – Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Configuration
-2.24	679.9906	Vertical	BMD-350 - BLE 1Mbps, 2440 MHz and Live Valve Neo E-Optimized (820-09-166) - BLE 2Mbps, 2440MHz

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

5.9 Radiated Emissions Test Results

Note 1: 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.

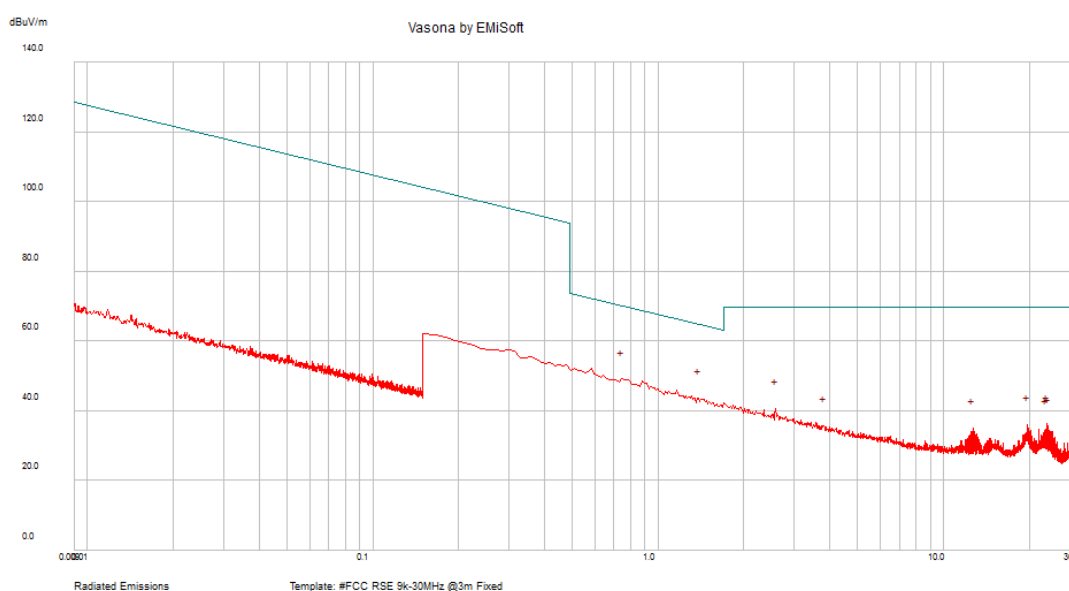
Note 2: All peaks exceeding the limit line in the graph that are not the fundamental, fall out of restricted bands and thus 20dBc limit (FCC 15.247(d) and ISEDC RSS-247 §6.6) was instead applied.

20dBc limit = $(-3.87\text{dBm}) + 95.2 - 20\text{dB} = 71.33\text{dBuV/m @3m}$

Note 3: BMD-350 and Live Valve Neo E-Optimized (820-09-166) radio modules were simultaneously transmitting during the testing. Worst case configuration BMD-350 - BLE 1Mbps, 2440 MHz and Live Valve Neo E-Optimized (820-09-166) - BLE 2Mbps, 2440MHz were used for colocation.

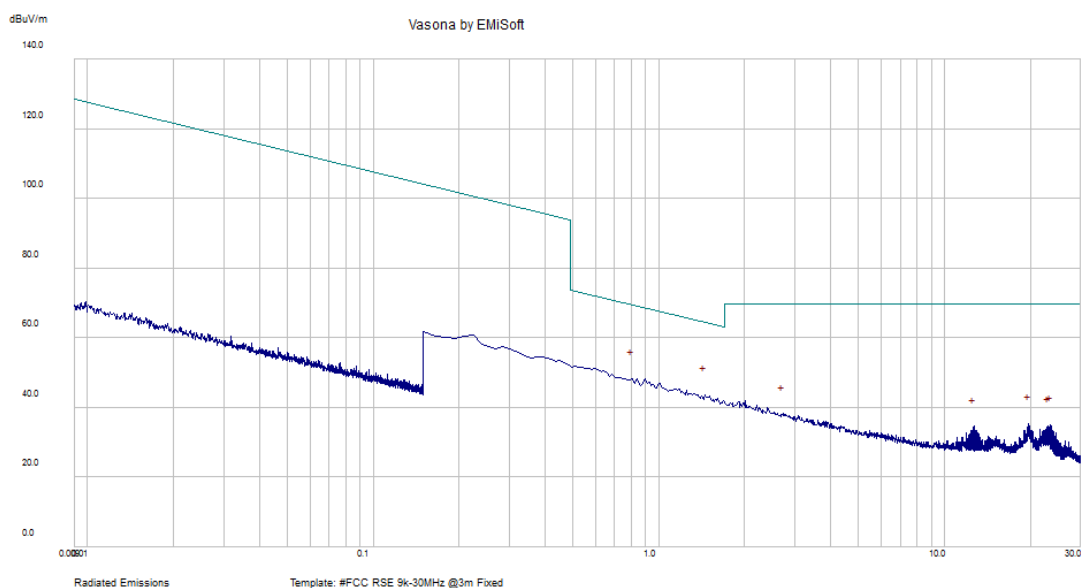
1) 9 kHz – 30 MHz, Measured at 3 meters

BLE, Middle Channel, 2440MHz, Perpendicular



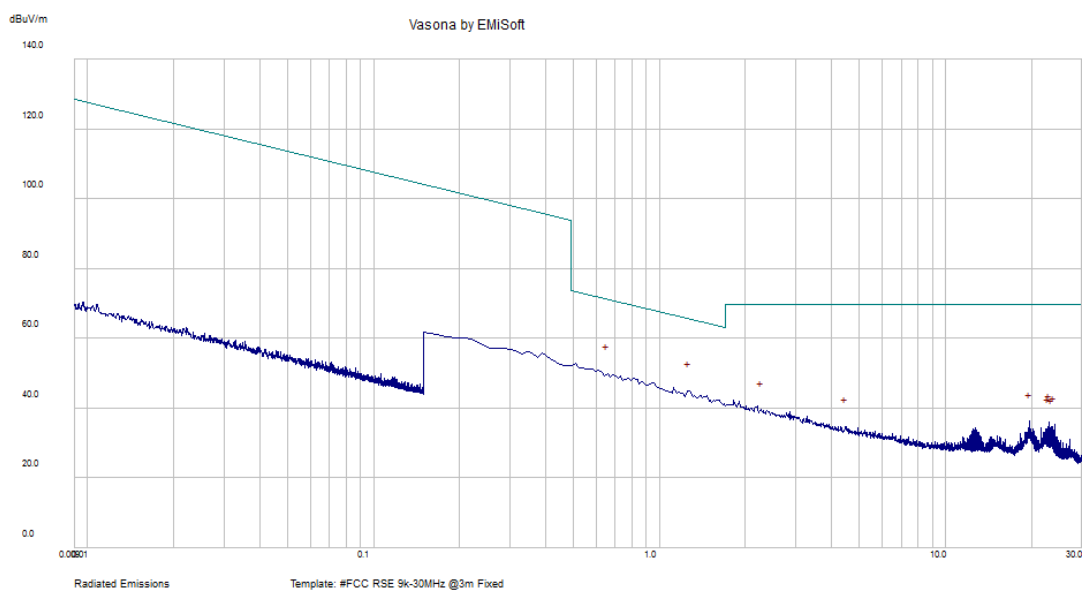
Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Detector
0.747	39.02	10.12	49.14	70.14	-21.00	Peak
1.388775	33.37	10.2	43.57	64.75	-21.18	Peak
2.582775	30.22	10.42	40.64	69.54	-28.90	Peak
23.1345	27.39	8.83	36.22	69.54	-33.32	Peak
19.71668	26.22	9.88	36.1	69.54	-33.44	Peak
3.82155	25.32	10.43	35.75	69.54	-33.79	Peak

Note: Peak measurement was used to compare to the quasi-peak limit to show compliance.

BLE, Middle Channel, 2440MHz, Parallel

Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Detector
1.448475	33.36	10.22	43.58	64.39	-20.81	Peak
0.8067	38.21	10.09	48.3	69.47	-21.17	Peak
2.7171	27.7	10.43	38.13	69.54	-31.41	Peak
19.68683	25.51	9.89	35.4	69.54	-34.14	Peak
23.58225	26.11	8.91	35.02	69.54	-34.52	Peak
23.0748	25.88	8.82	34.7	69.54	-34.84	Peak

Note: Peak measurement was used to compare to the quasi-peak limit to show compliance.

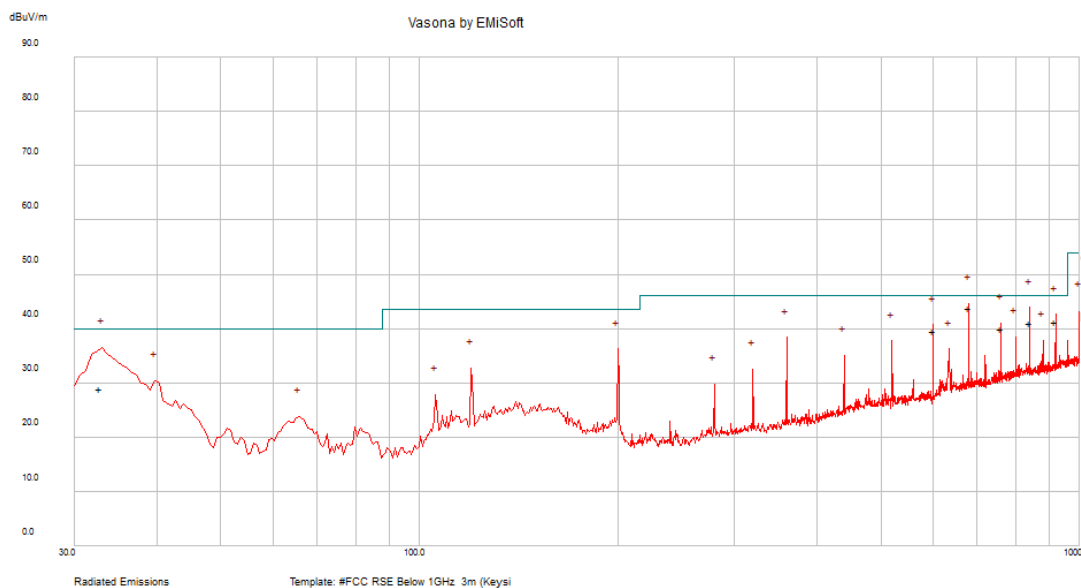
BLE, Middle Channel, 2440MHz, Ground Parallel

Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Detector
1.269375	34.89	10.16	45.05	65.53	-20.49	Peak
0.65745	39.7	10.14	49.84	71.25	-21.41	Peak
2.26935	29.07	10.4	39.47	69.54	-30.07	Peak
19.71668	26.26	9.87	36.13	69.54	-33.41	Peak
23.1345	26.98	8.83	35.81	69.54	-33.73	Peak
24.07478	26.19	9.00	35.19	69.54	-34.35	Peak

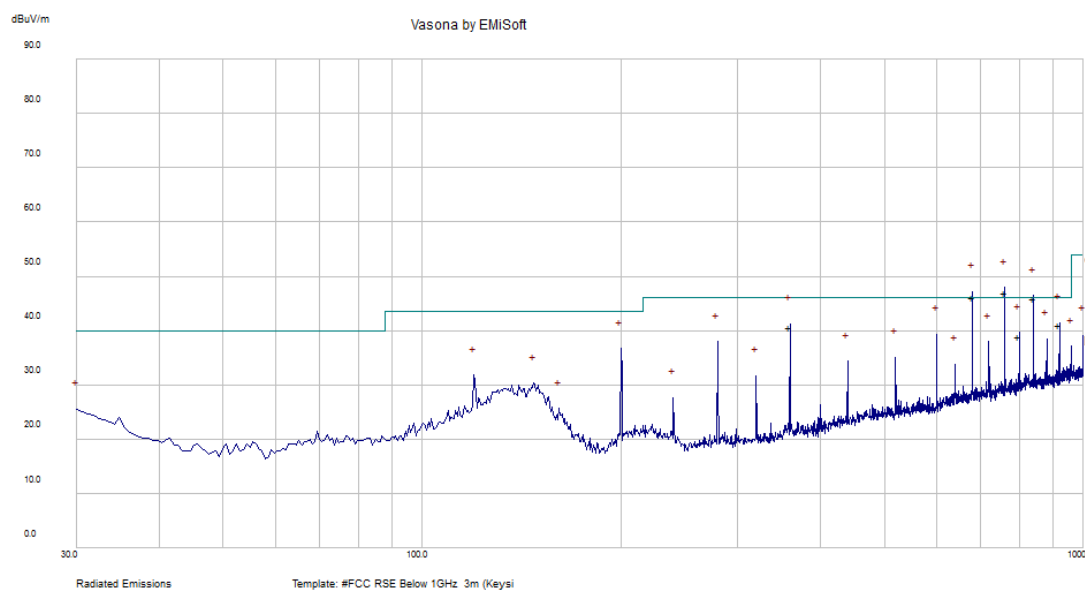
Note: Peak measurement was used to compare to the quasi-peak limit to show compliance.

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

BLE , Middle Channel, 2440MHz, Vertical



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Detector
679.9906	51.05	-7.29	43.76	46	-2.24	QP
839.9641	46	-5.01	40.99	46	-5.01	QP
32.81969	40.93	-12.06	28.87	40	-11.14	QP
920.0025	45.32	-4.14	41.18	46	-4.82	QP
759.9972	46.07	-6.05	40.02	46	-5.98	QP
599.9913	48.87	-9.27	39.6	46	-6.40	QP

BLE, Middle Channel, 2440MHz, Horizontal

Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Detector
759.9903	53.11	-6.04	47.07	71.33	-24.26	QP ¹
679.9763	53.53	-7.29	46.24	71.33	-25.09	QP ¹
840.0022	50.99	-5.02	45.97	71.33	-25.36	QP ¹
920.0038	45.2	-4.15	41.05	46	-4.95	QP
360.0022	54.38	-13.71	40.67	46	-5.33	QP
800.0081	44.52	-5.53	38.99	46	-7.01	QP

Note¹: Emission falls out of restricted bands and thus 20dBc limit 71.33 dBμV/m was instead applied. Please refer to section 5.9 Note 2 for 20dBc limit (FCC 15.247(d) and ISED RSS-247 §6.6) calculation.

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 ²
Restricted Band Peak Limit ¹	-	-	74

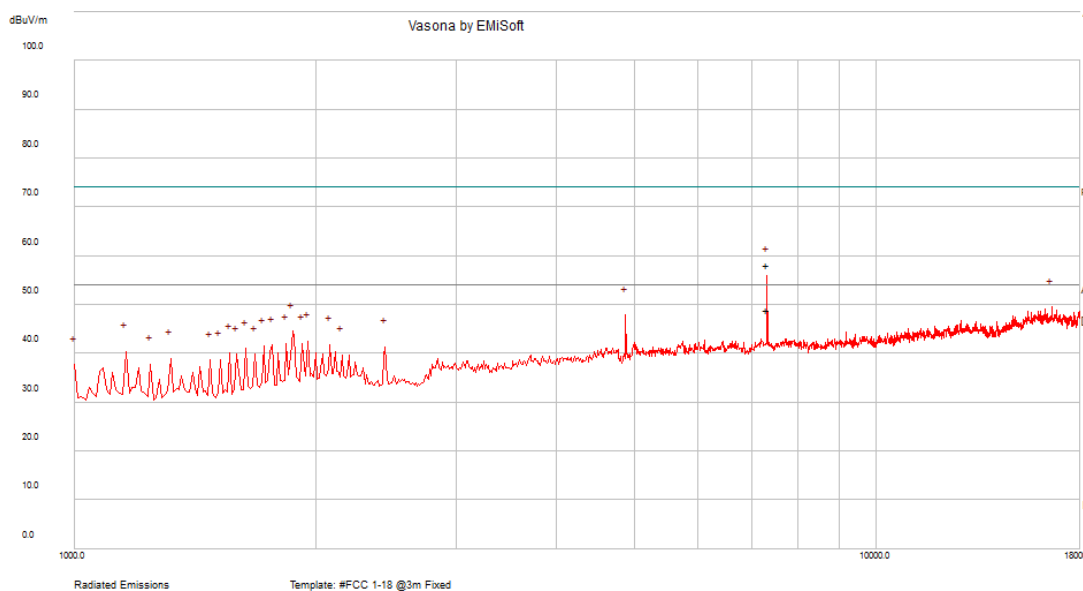
Note 1: Restricted Band Peak Limit is defined to be 20dB higher than Average Limit.

Note 2: Above 1GHz limit calculation:

$$\text{dBuV/m} = 20 \cdot \log(\text{V/m}) + 120 = 20 \cdot \log((500 \text{ [uV/m]}/1000000)) + 120 = 54 \text{ [dBuV/m]}$$

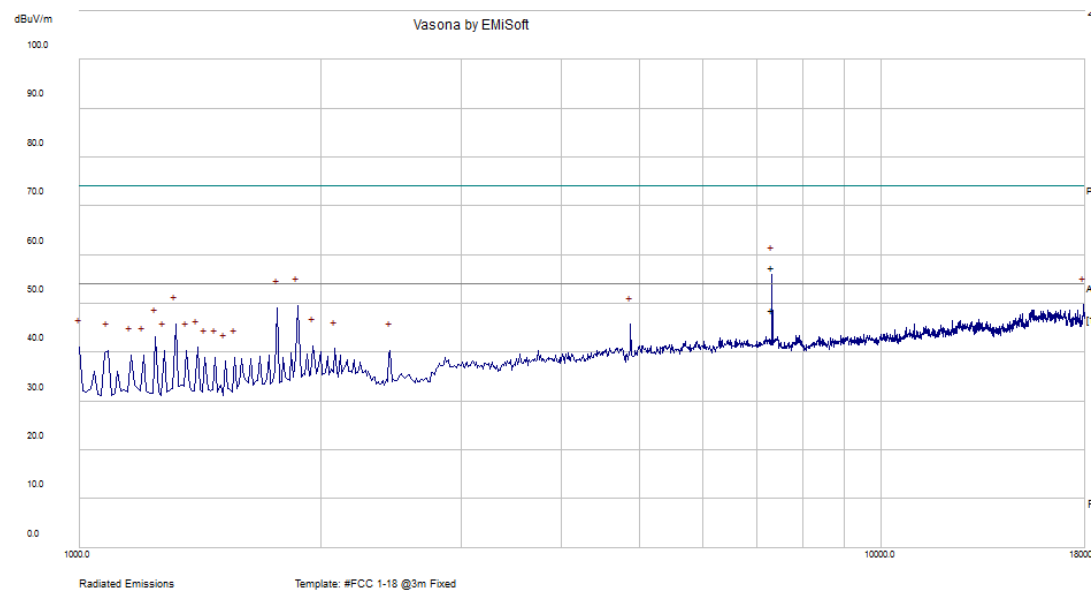
3) 1 GHz – 18 GHz, Measured at 3 meters

BLE , Middle Channel, 2440MHz, Vertical



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Detector
7320.59	52.92	5.19	58.11	74	-15.89	Peak
7320.59	43.77	5.19	48.96	54	-5.04	Average

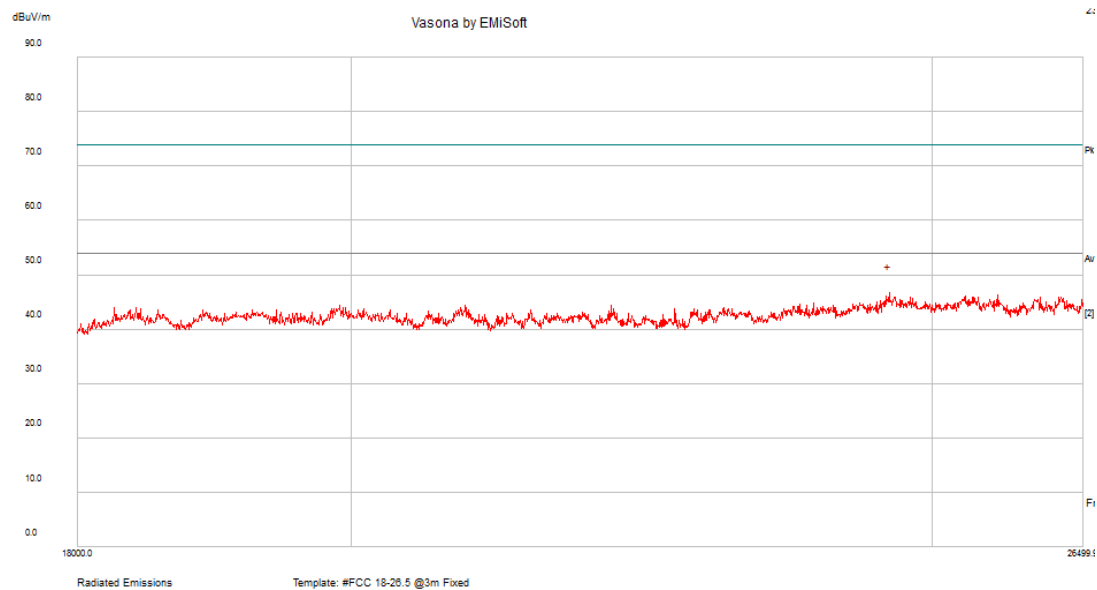
BLE, Middle Channel, 2440MHz, Horizontal



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Detector
7320.81	52.29	5.19	57.48	74	-16.52	Peak
7320.81	43.6	5.19	48.79	54	-5.21	Average

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

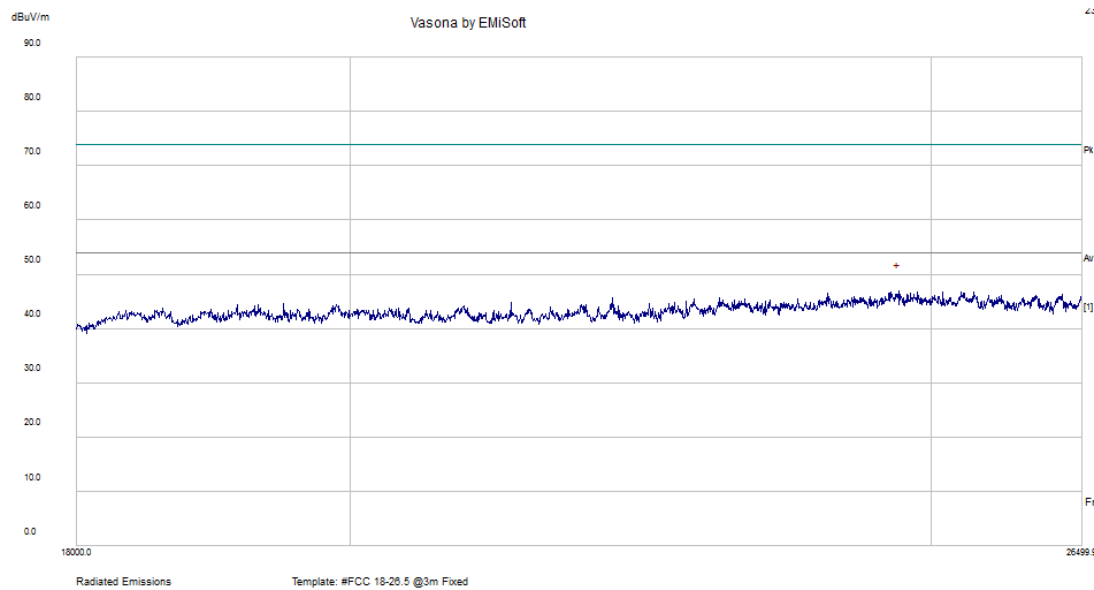
BLE, Middle Channel, 2440MHz, Vertical



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Detector
24592.81	40.66	5.99	46.65	54	-7.35	Peak

Note: The plot above shows that all peak emissions from 18 – 26.5GHz passed the average limits.

BLE, Middle Channel, 2440MHz, Horizontal



Frequency (MHz)	S.A. Reading (dBuV)	Correction Factor (dB/m)	Corrected Amplitude (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Detector
24693.75	41.06	5.79	46.85	54	-7.15	Peak

Note: The plot above shows that all peak emissions from 18 – 26.5GHz passed the average limits.

6 Appendix A (Normative) – EUT Test Setup Photographs

Please refer to the attachment.

7 Appendix B (Normative) – EUT External Photographs

Please refer to the attachment.

8 Appendix C (Normative) – EUT Internal Photographs

Please refer to the attachment.

9 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.

A blue ink signature of Mr. Trace McInturf.

Mr. Trace McInturf, 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>

--- END OF REPORT ---