

TEST REPORT

Test Report No. : UL-RPT-RP15725823-416A

Applicant* : Herga Technology a Division of Variohm Eurosensor Ltd.

Model No. / HVIN* : 6311-BLE5-003

PMN* : 6311-BLE5-003

FCC ID* : 2BT3E-4861-0029 **IC*** : 34998-48610029

Technology : *Bluetooth* – Low Energy

Test Standard(s) : FCC Parts 15.35(c), 15.209(a) & 15.247(d)
Innovation, Science and Economic Development Canada
RSS-247 Issue 4 July 2025, Section 6.6
RSS-Gen Issue 5 February 2021, Section 6.13 & 8.9

Test Laboratory : UL International (UK) Ltd, Basingstoke, Hampshire, RG24 8AH,
United Kingdom

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3. The sample tested is in compliance with the above standard(s).
4. The test results in this report are traceable to the national or international standards.
5. All information marked with (*) was provided by the Customer, Applicant or Authorised representative
6. Version 3.0 supersedes all previous versions.

Date of Issue: 05 October 2026

Checked by:



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Staff Engineer, Radio Laboratory

Company Signatory:



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Applicant Information

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Address*:	Northern Way Industrial Estate, Bury St Edmunds, Suffolk IP32 6NN United Kingdom

Report Revision History

Version Number	Issue Date	Revision Details	Revised By
1.0	09/03/2025	Initial Version	Sarah Williams
2.0	14/05/2026	Model number updated	Ben Mercer
3.0	05/10/2026	Address TCB feedback	Sarah Williams

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1 Attestation of Test Results

1.1 Description of EUT

The equipment under test (EUT) was a *Bluetooth* module used in a wireless footswitch and receiver system.*

1.2 General Information

Specification Reference:	47CFR15.247
Specification Title:	Code of Federal Regulations Volume 47 (Telecommunication): Part 15 Subpart C (Intentional Radiators) – Section 15.247
Specification Reference:	47CFR15.209
Specification Title:	Code of Federal Regulations Volume 47 (Telecommunication): Part 15 Subpart C (Intentional Radiators) – Section 15.209
Specification Reference:	RSS-247 Issue 4 July 2025
Specification Title:	Digital Transmission Systems, Frequency Hopping Systems and Licence-Exempt Local Area Network Devices in 902-928 MHz, 2400-2483.5 MHz, 5150-5350 MHz, and 5470-5895 MHz bands
Specification Reference:	RSS-Gen Issue 5 February 2021
Specification Title:	General Requirements for Compliance of Radio Apparatus
Site Registration:	FCC: 685609, ISEDC: 20903
FCC Lab. Designation No.:	UK2011
ISEDC CABID:	UK0001
Location of Testing:	Units 3 & 4 Horizon, Wade Road, Kingsland Business Park, Basingstoke, Hampshire, RG24 8AH, United Kingdom
Test Dates:	22 October 2025 to 23 October 2025

1.3 Summary of Test Results

FCC Clause (47CFR)	ISED Clause	Transmitter Measurement	Result
Part 15.247(d) & 15.209(a)	RSS-247 6.6 / RSS-Gen 6.13	Radiated Emissions	Complied
Part 15.247(d) & 15.209(a)	RSS-247 6.6 / RSS-Gen 6.13	Band Edge Radiated Emissions	Complied

1.4 Deviations from the Test Specification

For the measurements contained within this test report, there were no deviations from, additions to, or exclusions from the test specification identified above.

2 Summary of Testing

2.1 Facilities and Accreditation

The test site and measurement facilities used to collect data are located at Units 3 & 4 Horizon, Wade Road, Kingsland Business Park, Basingstoke, Hampshire, RG24 8AH, United Kingdom. The following table identifies which facilities were utilised for radiated emission measurements documented in this report. Specific facilities are also identified in the test results sections.

Site 1	-
Site 17	-
Site 32	-
Site 33	X

UL International (UK) Ltd is accredited by the United Kingdom Accreditation Service (UKAS). UKAS is one of the signatories to the International Laboratory Accreditation Co-operation (ILAC) Arrangement for the mutual recognition of test reports. The tests reported herein have been performed in accordance with its terms of accreditation.

2.2 Methods and Procedures

Reference:	ANSI C63.10-2020 + Cor1-2023 + C63.10a-2024 + Errata to C63.10a-2024
Title:	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices

2.3 Calibration and Uncertainty

Measuring Instrument Calibration

In accordance with UKAS requirements all the measurement equipment is on a calibration schedule. All equipment was within the calibration period on the date of testing.

Measurement Uncertainty & Decision Rule

Overview

No measurement or test can ever be perfect and the imperfections give rise to error of measurement in the results. Consequently the result of a measurement is only an approximation to the value of the measurand (the specific quantity subject to measurement) and is only complete when accompanied by a statement of the uncertainty of the approximation.

The expression of uncertainty of a measurement result allows realistic comparison of results with reference values and limits given in specifications and standards.

Decision Rule

Measurement system instrumentation shall be used with an accuracy specification meeting the accuracy specification limits according to IEC/IECEE OD-5014.

As applicable, unless specified otherwise in this quotation, the compliance "Decision Rule" is based on Simple Acceptance. If the measured value is on the limit, the result is defined as a pass. For further information regarding risk assessment refer to ILAC G8:09/2019.

Measurement Uncertainty

The reported expanded uncertainties below are based on a standard uncertainty multiplied by an appropriate coverage factor such that a confidence level of approximately 95% is maintained. For the purposes of this document "approximately" is interpreted as meaning "effectively" or "for most practical purposes".

Measurement Type	Range	Confidence Level (%)	Calculated Uncertainty
Radiated Spurious Emissions	9 kHz to 30 MHz	95%	±5.44 dB
Radiated Spurious Emissions	30 MHz to 1 GHz	95%	±4.66 dB
Radiated Spurious Emissions	1 GHz to 25 GHz	95%	±5.06 dB

The methods used to calculate the above uncertainties are in line with those recommended within the various measurement specifications. Where measurement specifications do not include guidelines for the evaluation of measurement uncertainty the published guidance of the appropriate accreditation body is followed.

2.4 Sample Calculation

Where relevant, the following calculations were used:

Radiated Emissions

- The recorded emission level was calculated from the level indicated by the measuring receiver, adjusted by a transducer factor (TDF in dB), calculated using the formula:

$$\text{TDF (dB)} = C_{\text{Att}} \text{ (dB)} + \text{AF (dB/m)} - P_{\text{Gain}} \text{ (dB)}$$

Where:

C_{Att} : conducted path attenuation (cables + attenuators)

AF: antenna factor

P_{Gain} : external preamplifier gain

The TDF was further adjusted if the measurement distance was different to the specified limit distance.

2.5 Test and Measurement Equipment

Test Equipment Used for Radiated Emissions Tests

Asset No.	Instrument	Manufacturer	Type No.	Serial No.	Date Calibration Due	Cal. Interval (Months)
M226556	Thermohygrometer	Testo	608-H1	83800306	20 Dec 2025	12
K226203	3m RSE Chamber	Albatross Projects	N/A	N/A	29 Apr 2026	12
M227312	Test Receiver	Rohde & Schwarz	ESW44	103203	10 Sep 2026	12
A231567	Pre-Amplifier	RF Bay Inc.	LNA-1070	2	28 Apr 2026	12
A3142	Pre-Amplifier	Schwarzbeck	BBV 9718 B	00020	25 Apr 2026	12
A230567	Pre-Amplifier	Atlantic Microwave	A-HPAKX-380143-K5K5	VJ3601001	14 Apr 2026	12
A3165	Mag Loop Antenna	ETS-Lindgren	6502	00224383	25 Mar 2026	12
A225134	Antenna	Teseq, Inc	CBL6111D	62222	13 Mar 2026	12
A231044	Antenna	Schwarzbeck	BBHA 9120 B	00835	28 Apr 2026	12
A231045	Antenna	Schwarzbeck	HWRD 750	00064	28 Apr 2026	12
A231050	Antenna	Schwarzbeck	BBHA 9170	01280	14 Apr 2026	12
A3115	Attenuator	AtlanTecRF	AN18-06	219706#5	13 Mar 2026	12
A227129	High Pass Filter	Micro-Tronics	HPS20722	003	06 May 2026	12
A231864	Pre-Amplifier	Atlantic Microwave	A-LNAKX-380116-S5S5	221044002	28 Apr 2026	12
A230451	Attenuator	Atlantic Microwave	ATT10KXP-483034-N4N5	Not stated	06 May 2026	12
A227133	High Pass Filter	Micro-Tronics	HPM21019	002	07 Apr 2026	12
C227002	Cable	Huber+Suhner	SF126EA/11N/11N/6000mm	520901	29 Apr 2026	12
C226916	Cable	Huber+Suhner	SF126EA/11N/11N/4000mm	520384	29 Apr 2026	12
C226955	Cable	Huber+Suhner	SF126EA/11N/11N/2000mm	520363	29 Apr 2026	12
C226942	Cable	Huber+Suhner	SF126EA/11N/11N/800mm	520358	29 Apr 2026	12
C226944	Cable	Huber+Suhner	SF126EA/11N/11N/800mm	520357	29 Apr 2026	12
C227003	Cable	Huber+Suhner	SF126EA/11N/11N/6000mm	520902	29 Apr 2026	12
C226957	Cable	Huber+Suhner	SF126EA/11N/11N/2000mm	520366	29 Apr 2026	12
C226943	Cable	Huber+Suhner	SF126EA/11N/11N/800mm	520361	29 Apr 2026	12
C226964	Cable	Huber+Suhner	SF126EA/11N/11N/4500mm	520381	29 Apr 2026	12
C223506	Cable	Schwarzbeck	AK 9540-2.0	00035	29 Apr 2026	12

Test and Measurement Equipment (continued)**Test Equipment Used for Band Edge Radiated Emissions Tests**

Asset No.	Instrument	Manufacturer	Type No.	Serial No.	Date Calibration Due	Cal. Interval (Months)
K226203	3m RSE Chamber	Albatross Projects	N/A	N/A	29 Apr 2026	12
M226556	Thermohygrometer	Testo	608-H1	83800306	20 Dec 2025	12
M227312	Test Receiver	Rohde & Schwarz	ESW44	103203	10 Sep 2026	12
A3142	Pre-Amplifier	Schwarzbeck	BBV 9718 B	00020	25 Apr 2026	12
A230451	Attenuator	Atlantic Microwave	ATT10KXP-483034-N4N5	Not stated	06 May 2026	12
A231044	Horn Antenna	Schwarzbeck	BBHA 9120 B	00835	28 Apr 2026	12
C227002	Cable	Huber+Suhner	SF126EA/11N/11N/6000mm	520901	29 Apr 2026	12
C226916	Cable	Huber+Suhner	SF126EA/11N/11N/4000mm	520384	29 Apr 2026	12
C226955	Cable	Huber+Suhner	SF126EA/11N/11N/2000	520363/126EA	29 Apr 2026	12
C226942	Cable	Huber+Suhner	SF126EA/11N/11N/800	520358/126EA	29 Apr 2026	12

3 Equipment Under Test (EUT)

3.1 Identification of Equipment Under Test (EUT)

Brand Name*:	Herga Technology a Division of Variohm Eurosensor Ltd.
Model Name or Number / HVIN*:	6311-BLE5-003
PMN*:	6311-BLE5-003
Test Sample Serial Number*:	01 (<i>Radiated sample</i>)
Hardware Version*:	REV 01
Firmware Version*:	REV 01
FCC ID*:	2BT3E-4861-0029
ISED Canada Certification Number*:	34998-48610029
Date of Receipt:	20 October 2025

3.2 Modifications Incorporated in the EUT

No modifications were applied to the EUT during testing.

3.3 Additional Information Related to Testing

Technology Tested:	<i>Bluetooth</i> Low Energy (Digital Transmission System)		
Type of Unit:	Transceiver		
Channel Spacing:	2 MHz		
Modulation:	GFSK		
Data Rate LE1M*:	1 Mbps		
Data Rate LE2M*:	2 Mbps		
Power Supply Requirement(s):	12 VDC via 120 VAC 60 Hz		
Transmit Frequency Range:	2402 MHz to 2480 MHz		
Transmit Channels Tested:	Channel ID	Channel Number	Channel Frequency (MHz)
	Bottom	37	2402
	Middle	17	2440
	Top	39	2480

3.4 Description of Available Antennas

The radio utilizes an external antenna, with the following maximum gain:

Frequency Range (MHz)	Antenna Gain (dBi)*
2400-2480	3.0

3.5 Description of Test Setup

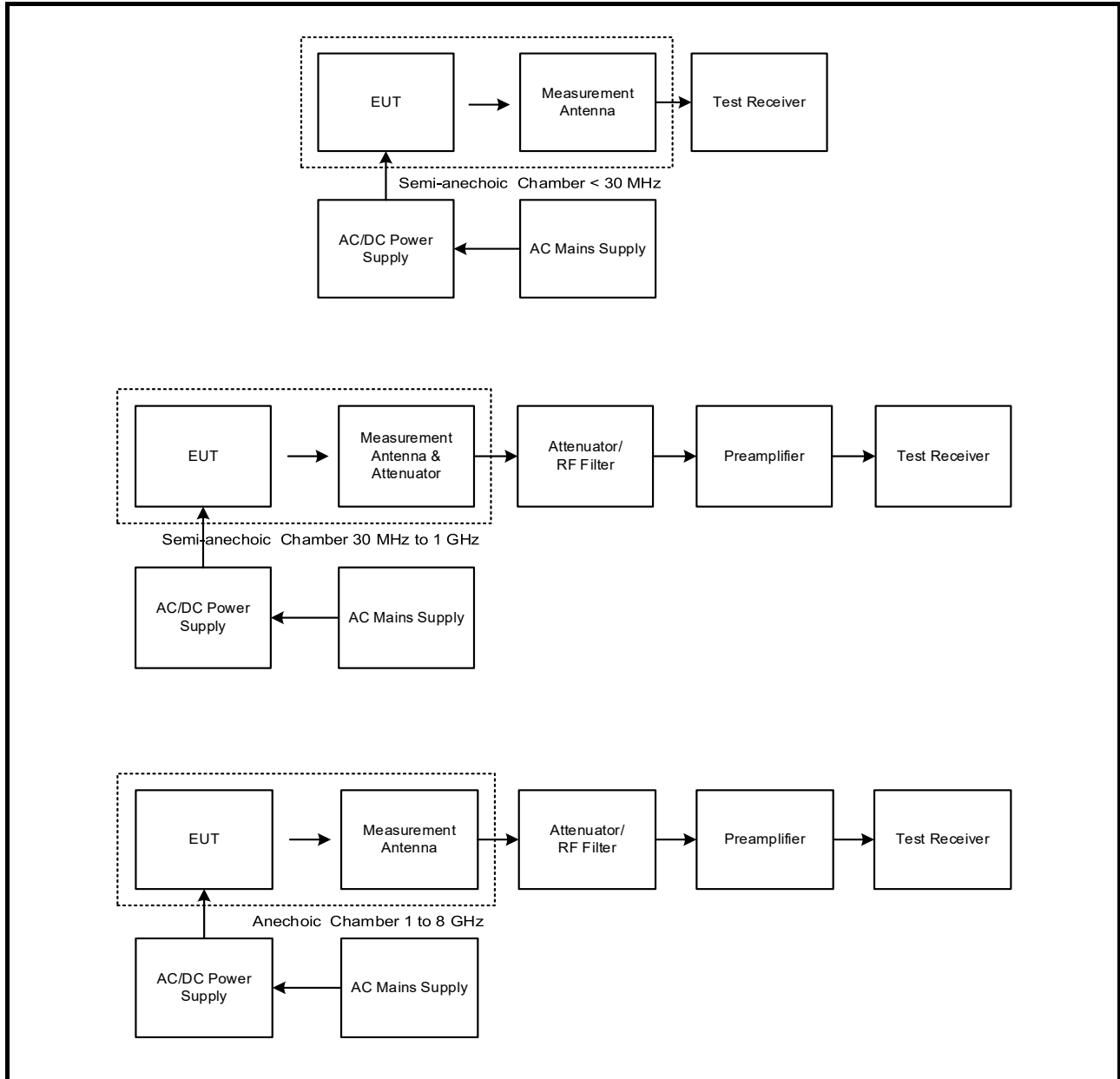
Support Equipment

Customer Supplied*:

Description	Brand Name	Model Name or Number	Serial Number
Test Laptop	Dell	Latitude E5570	Not marked or stated
USB to TTL cable	Not marked or stated	Not marked or stated	Not marked or stated
AC to DC Power Supply	Power Pax	KSAS0121200100HK	P4115
Carrier PCB	Not marked or stated	Not marked or stated	Not marked or stated

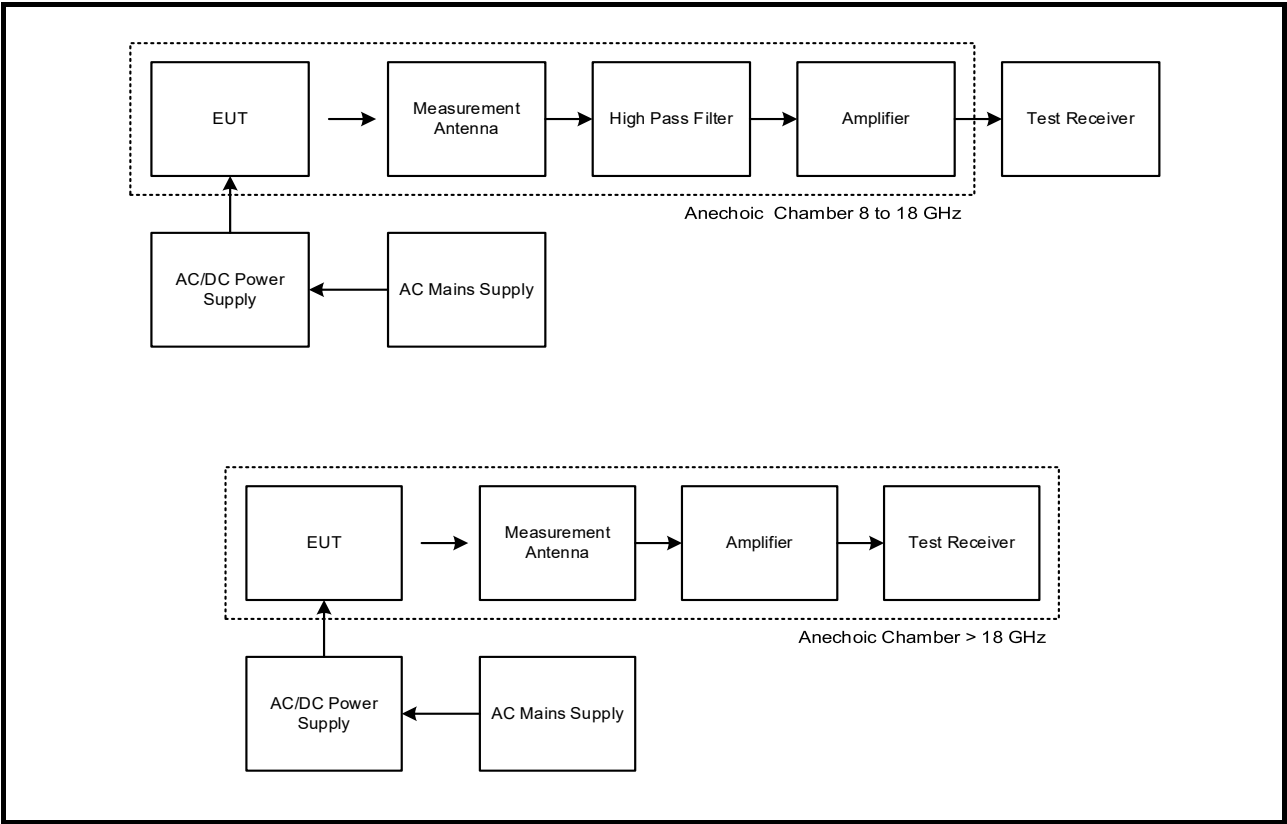
Operating Modes, Configuration and Peripherals

- Transmitting at maximum power in the following *Bluetooth* modes with modulation, maximum possible data length available and Pseudorandom Bit Sequence 9:
 - LE1M
 - LE2M
- A test laptop with a third party test application was provided by the customer and was used to place the EUT into *Bluetooth LE* test mode. The application was used to enable continuous transmission in different modes, set transmit power setting and change channels as required.
- Radiated emissions were performed with the EUT in the position that produced worst case with respect to emission. The EUT was powered from the carrier PCB, which was connected to an AC to DC Power Supply connected to a 120 VAC 60 Hz single phase mains supply.
- Radiated spurious emissions tests were performed with the EUT transmitting in LE1M mode as this was found to transmit the highest power.

Test Setup Diagrams**Radiated Tests:****Test Setup for Radiated Emissions**

Test Setup Diagrams (continued)

Test Setup for Radiated Emissions (continued)



4 Radiated Test Results

4.1 Radiated Emissions <1 GHz

Test Summary:

Test Engineer:	Nick Steele	Test Date:	23 October 2025
Test Sample Serial Number:	01		

FCC Clause:	Parts 15.247(d) & 15.209(a)
ISED Canada Clause:	RSS-247 6.6 / RSS-Gen 6.13 & 8.9
Test Method Used:	ANSI C63.10 Sections 6.3, 6.4 and 6.5
Frequency Range	9 kHz to 1000 MHz

Environmental Conditions:

Temperature (°C):	20
Relative Humidity (%):	52

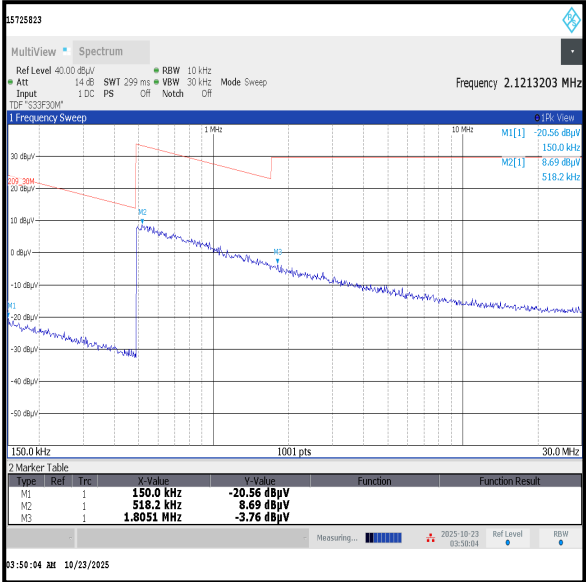
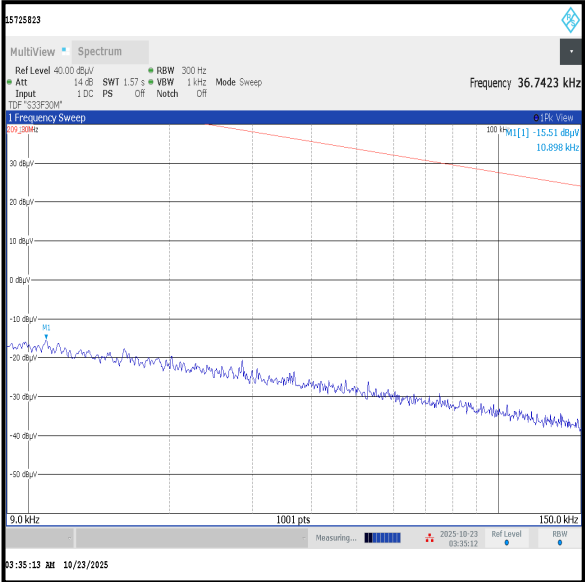
Radiated Emissions (continued)**Note(s):**

1. The preliminary scans showed similar emission levels below 1 GHz, for each channel of operation. Therefore final radiated emissions measurements were performed with the EUT set to the middle channel only.
2. All emissions shown on the pre-scan plots were investigated and found to be ambient, >20 dB below the applicable limit or below the measurement system noise floor. Therefore the highest peak noise floor reading of the measuring receiver was recorded in the table below.
3. Measurements below 30 MHz were performed in a semi-anechoic chamber (Asset Number K0001) at 3 metres. The EUT was placed at a height of 80 cm above the reference ground plane in the centre of the chamber turntable. ANSI C63.10 clause 5.2 states an alternative test site that can demonstrate equivalence to an open area test site may be used for measurements below 30 MHz. Therefore, measurements were performed in a semi-anechoic chamber. The correlation data between semi-anechoic chamber and an open field test site is available upon request.
4. The measured values at 3 metres were extrapolated to the required measurement distances of 300 metres and 30 metres and compared to the specified limits at those distances:
 - 9 kHz to 490 kHz: measured value extrapolated from 3 metres to 300 metres by subtracting 80 dB at 40 dB / decade
 - 490 kHz to 30 MHz: measured value extrapolated from 3 metres to 30 metres by subtracting 40 dB at 40 dB / decade
5. The limits in CFR 47, Part 15, Subpart C, paragraph 15.209 (a), are identical to those in RSS-Gen Section 8.9, Table 6, since the measurements are performed in terms of magnetic field strength and converted to electric field strength levels (as reported in the table) using the free space impedance of 377Ω . For example, the measurement frequency X kHz resulted in a level of Y dBuV/m, which is equivalent to $Y - 51.5 = Z$ dBuA/m, which has the same margin, W dB, to the corresponding RSS-Gen Table 6 limit as it has to the 15.209(a) limit.
6. Measurements from 30 MHz to 1 GHz were performed in a semi-anechoic chamber (Asset Number K226203) at a distance of 3 metres. The EUT was placed at a height of 80 cm above the reference ground plane in the centre of the chamber turntable. Maximum emission levels were determined by height searching the measurement antenna over the range 1 metre to 4 metres.
7. Pre-scans were performed and markers placed on the highest measured levels. The test receiver was configured as follows: For 9 kHz to 150 kHz, the resolution bandwidth was set to 300 Hz and video bandwidth 1 kHz. A peak detector was used and trace mode was Max Hold. For 150 kHz to 30 MHz, the resolution bandwidth was set to 10 kHz and video bandwidth 30 kHz, trace mode was Max Hold. For 30 MHz to 1 GHz, the resolution bandwidth was set to 120 kHz and video bandwidth 500 kHz. A peak detector was used, sweep time was set to auto and trace mode was Max Hold.

Radiated Emissions (continued)

Results: Peak / Middle Channel / LE1M

Frequency (MHz)	Level (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Antenna Polarity
968.514	30.0	54.0	24.0	Vertical



4.2 Radiated Emissions >1 GHz

Test Summary:

Test Engineer:	Nick Steele	Test Dates:	22 October 2025 & 23 October 2025
Test Sample Serial Number:	01		

FCC Clause:	Parts 15.247(d) & 15.209(a)
ISED Canada Clause:	RSS-247 6.6 / RSS-Gen 6.13 & 8.9
Test Method Used:	ANSI C63.10 Sections 6.3, 6.6, 11.11 & 11.12
Frequency Range	1 GHz to 25 GHz

Environmental Conditions:

Temperature (°C):	20
Relative Humidity (%):	52

Note(s):

1. The final measured value, for the given emission, in the table below incorporates the calibrated antenna factor and cable loss.
2. All other emissions shown on the pre-scan plot were investigated and found to be ambient or >20 dB below the appropriate limit or below the measurement system noise floor.
3. The emission shown approximately at 2440 MHz on the 1 GHz to 3 GHz plot is the EUT fundamental.
4. #In accordance with ANSI C63.10 Section 6.6.4.3, Note 1, if the peak measured value complies with the average limit, it is unnecessary to perform an average measurement.
5. Pre-scans and final measurements above 1 GHz were performed in a semi-anechoic chamber (Asset Number K226203) at a distance of 3 metres. The EUT was placed at a height of 1.5 m above the reference ground plane in the centre of the chamber turntable. Maximum emission levels were determined by height searching the measurement antenna over the range 1 metre to 4 metres.
6. Pre-scans were performed and a marker placed on the highest measured level of the appropriate plot. The test receiver resolution bandwidth was set to 1 MHz and video bandwidth 3 MHz. The sweep time was set to auto. Peak and average measurements were performed with their own appropriate detectors during the pre-scan measurements.

Radiated Emissions (continued)**Results: Bottom Channel / LE1M**

Frequency (MHz)	Peak Level (dB μ V/m)	Average Limit (dB μ V/m)	Margin (dB)	Antenna Polarity
4803.800	49.5	54.0	4.5	Vertical
12011.059	46.5	54.0	7.5	Vertical

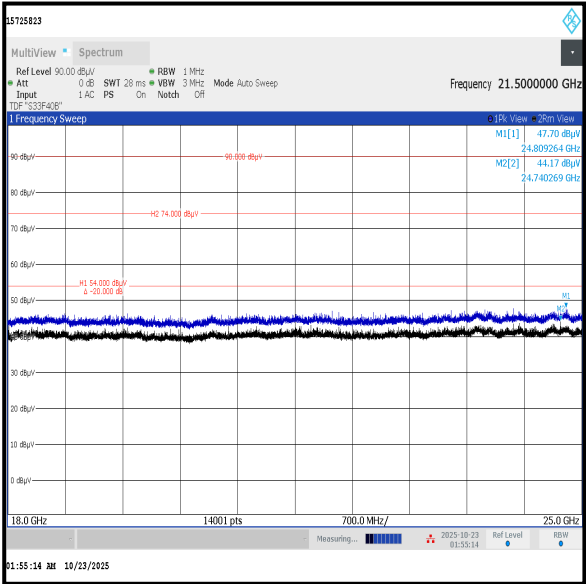
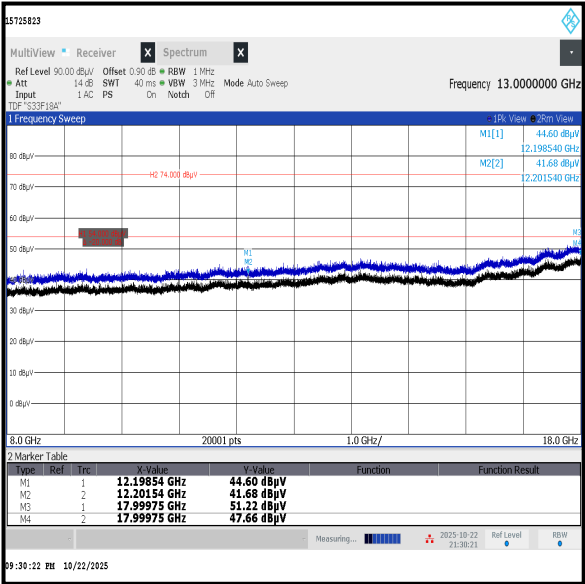
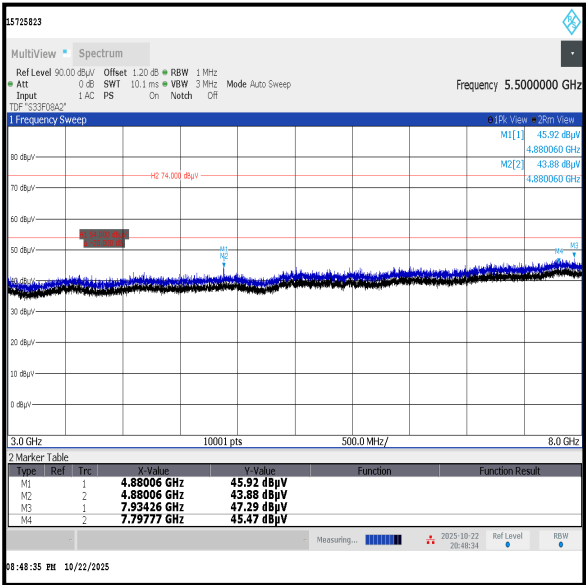
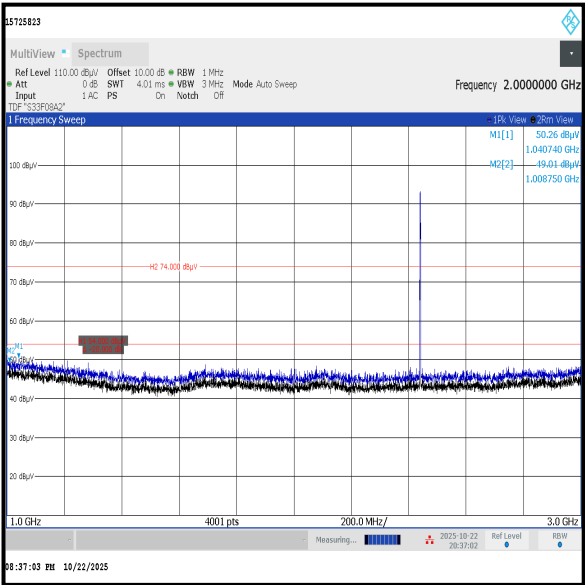
Results: Middle Channel / LE1M

Frequency (MHz)	Peak Level (dB μ V/m)	Average Limit (dB μ V/m)	Margin (dB)	Antenna Polarity
4880.290	47.4	54.0	6.6	Vertical
12201.159	47.0	54.0	7.0	Vertical

Results: Top Channel / LE1M

Frequency (MHz)	Peak Level (dB μ V/m)	Average Limit (dB μ V/m)	Margin (dB)	Antenna Polarity
4959.431	46.6	54.0	7.4	Vertical
12401.279	48.5	54.0	5.5	Vertical

Radiated Emissions (continued)



Note: The plots are pre-scans and for indication purposes only. For final measurements, see accompanying tables.

4.3 Band Edge Radiated Emissions

Test Summary:

Test Engineer:	John Ferdinand	Test Date:	22 October 2025
Test Sample Serial Number:	01		

FCC Clause:	Parts 15.247(d) & 15.209(a)
ISED Canada Clause:	RSS-247 6.6 / RSS-Gen 6.13
Test Method Used:	ANSI C63.10 Sections 11.11 & 11.12

Environmental Conditions:

Temperature (°C):	22
Relative Humidity (%):	53

Note(s):

1. The final measured value, for the given emission, in the table below incorporates the calibrated antenna factor and cable loss.
2. # -20 dBc limit.

Band Edge Radiated Emissions (continued)**Results: Peak / LE1M**

Frequency (MHz)	Level (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)	Antenna Polarity
2391.049	39.8	75.9 [#]	36.1	Vertical
2400.0	39.5	75.9 [#]	36.4	Vertical
2483.5	48.8	74.0	25.2	Vertical
2484.749	49.2	74.0	24.8	Vertical

Results: Average / LE1M

Frequency (MHz)	Level (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)	Antenna Polarity
2483.5	47.1	54.0	6.9	Vertical
2484.749	47.9	54.0	6.1	Vertical

Results: 2310 MHz to 2390 MHz Restricted Band / Peak

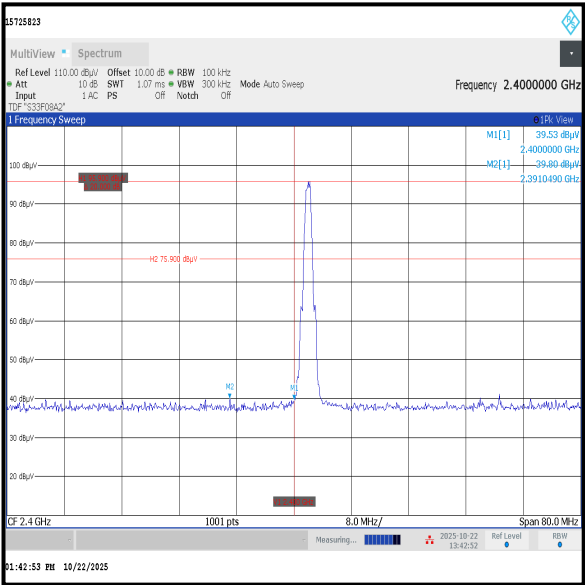
Frequency (MHz)	Level (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)	Antenna Polarity
2330.420	51.1	74.0	22.9	Vertical

Results: 2310 MHz to 2390 MHz Restricted Band / Average

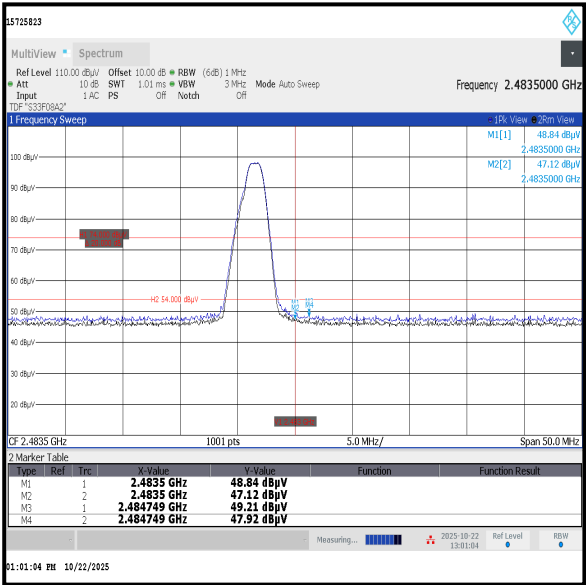
Frequency (MHz)	Level (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)	Antenna Polarity
2330.260	48.5	54.0	5.5	Vertical

Band Edge Radiated Emissions (continued)

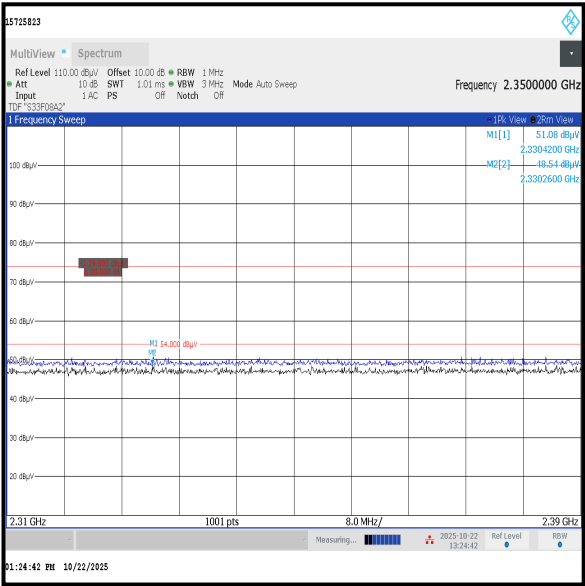
Results: LE1M



Lower Band Edge



Upper Band Edge



2310 MHz to 2390 MHz Restricted Band

Band Edge Radiated Emissions (continued)**Results: Peak / LE2M**

Frequency (MHz)	Level (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)	Antenna Polarity
2400.0	63.2	75.5 [#]	12.3	Vertical
2483.5	48.6	74.0	25.4	Vertical
2484.299	48.8	74.0	25.2	Vertical

Results: Average / LE2M

Frequency (MHz)	Level (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)	Antenna Polarity
2483.5	46.4	54.0	7.6	Vertical
2484.299	47.1	54.0	6.9	Vertical

Results: 2310 MHz to 2390 MHz Restricted Band / Peak / LE2M

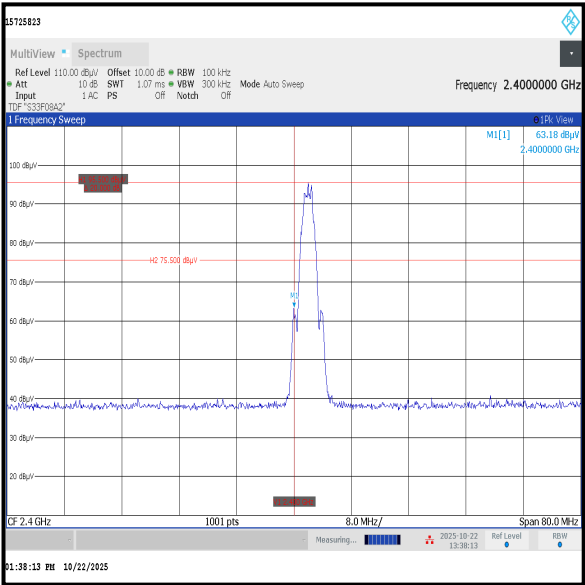
Frequency (MHz)	Level (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)	Antenna Polarity
2362.627	50.7	74.0	23.3	Vertical

Results: 2310 MHz to 2390 MHz Restricted Band / Average / LE2M

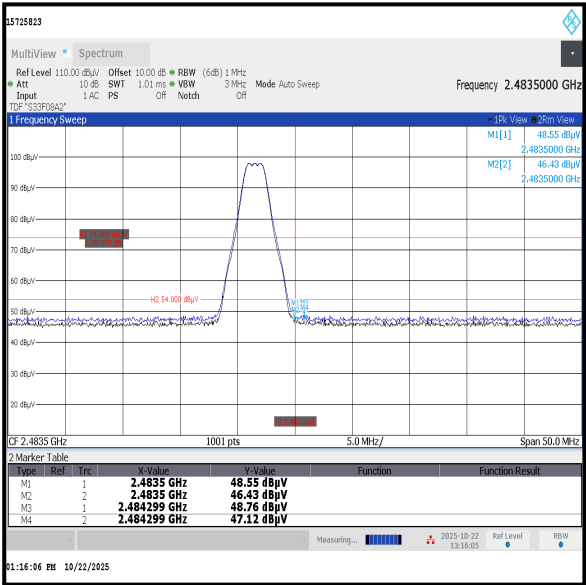
Frequency (MHz)	Level (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)	Antenna Polarity
2363.027	48.8	54.0	5.2	Vertical

Band Edge Radiated Emissions (continued)

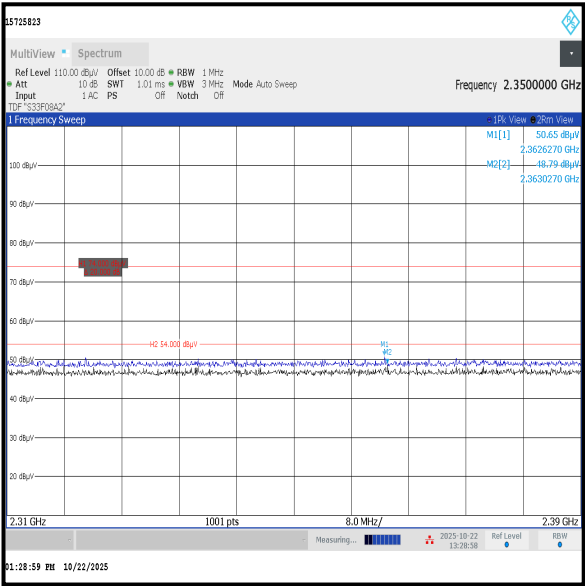
Results: LE2M



Lower Band Edge



Upper Band Edge



2310 MHz to 2390 MHz Restricted Band

--- END OF REPORT ---