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HEARING AID COMPATIBILITY

Applicant Name:
Microsoft Corporation
One Microsoft Way
Redmond, WA 98052
United States

Date of Testing:
9/27/2021
Test Site/Location:
PCTEST, Columbia, MD, USA
Test Report Serial No.:
1M2109130107-03.C3K
Date of Issue:
10/7/2021

FCC ID:	**C3K1995**
APPLICANT:	**MICROSOFT CORPORATION**

Scope of Test:	Audio Band Magnetic Testing (T-Coil)
Application Type:	Class II Permissive Change
FCC Rule Part(s):	CFR §20.19(b)
HAC Standard:	ANSI C63.19-2011 285076 D01 HAC Guidance v05 285076 D02 T-Coil testing for CMRS IP v03
DUT Type:	Portable Handset
Model:	1995
Test Device Serial No.:	*Pre-Production Sample* [S/N: 18766, 51385]
Class II Permissive Change(s):	*See FCC Change Document*
Original Grant Date:	*9/17/2021*

C63.19-2011 HAC Category:	**T3 (SIGNAL TO NOISE CATEGORY)**

The worst-case configurations from the original certification report (Report S/N: 1M2105060048-19.C3K) and Previous Class II Permissive Change Test Report (Report S/N: 1M2109100105-01.C3K) for the associated portable handsets were evaluated with the WPT Sleeve. Hearing-Aid Compatibility is based on the assumption that all production units will be designed electrically identical to the device tested in this report. Test results reported herein relate only to the item(s) tested. North America bands only.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

Randy Ortanez
President

ACCREDITED
CERT #2041.01

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1. INTRODUCTION

On July 10, 2003, the Federal Communications Commission (FCC) adopted new rules requiring wireless manufacturers and service providers to provide digital wireless phones that are compatible with hearing aids. The FCC has modified the exemption for wireless phones under the Hearing Aid Compatibility Act of 1998 (HAC Act) in WT Docket 01-309 RM-8658[1] to extend the benefits of wireless telecommunications to individuals with hearing disabilities. These benefits encompass business, social and emergency communications, which increase the value of the wireless network for everyone. An estimated more than 10% of the population in the United States show signs of hearing impairment and of that fraction, almost 80% use hearing aids. Approximately 500 million people worldwide and 30 million people in the United States suffer from hearing loss.

Compatibility Tests Involved:

The standard calls for wireless communications devices to be measured for:

- RF Electric-field emissions
- T-coil mode, magnetic-signal strength in the audio band
- T-coil mode, magnetic-signal frequency response through the audio band
- T-coil mode, magnetic-signal and noise articulation index

The hearing aid must be measured for:

- RF immunity in microphone mode
- RF immunity in T-coil mode

In the following tests and results, this report includes the evaluation for a wireless communications device.

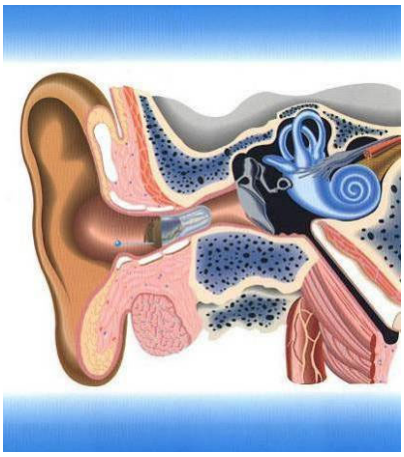

Figure 1-1 Hearing Aid *in-vitu*

[1] FCC Rule & Order, WT Docket 01-309 RM-8658

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2. DUT DESCRIPTION

FCC ID:	C3K1995
Applicant:	Microsoft Corporation One Microsoft Way Redmond, WA 98052 United States
Model:	1995
Serial Number:	18766, 51385
HW Version:	EV3 Debug
SW Version:	16.40.137 (Touch Version)
Antenna:	Internal Antenna
DUT Type:	Portable Handset

I. Device Serial Numbers

Several samples with identical hardware were used to support HAC testing. The manufacturer has confirmed that the device(s) tested have the same physical, mechanical, and thermal characteristics are within operational tolerances expected for production units. The serial numbers used for each test are indicated alongside the results in Section 6.

II. Device Configuration Testing

This device supports held to ear scenarios in both flip and flat postures. This device was evaluated in both postures.

III. Accessory Testing

This device was evaluated with the WPT Sleeve. Since this accessory has no additional transmitters, only the overall worst-case standalone configurations from the Original Certification Test Report and previous Class II Permissive Change Report were evaluated.

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Table 2-1
C3K1995 HAC Air Interfaces

Air-Interface	Band (MHz)	Type Transport	HAC Tested	Simultaneous But Not Tested	Name of Voice Service	Audio Codec Evaluated
GSM	850	VO	Yes[3]	Yes: WIFI or BT	CMRS Voice[1]	EFR
	1900					
	GPRS	VD	Yes[3]	Yes: WIFI or BT	Google Duo[2], MS Teams[2]	Google Duo: OPUS MS Teams: Satin, Silk
UMTS	850	VD	No[3]	Yes: WIFI or BT	CMRS Voice[1]	NB AMR, WB AMR
	1900					
	HSPA	VD	No[3]	Yes: WIFI or BT	Google Duo[2], MS Teams[2]	Google Duo: OPUS MS Teams: Satin, Silk
LTE (FDD)	680 (B71)	VD	No[3]	Yes: NR, WIFI or BT	VoLTE[1], Google Duo[2], MS Teams[2]	VoLTE: NB AMR, WB AMR, EVS Google Duo: OPUS MS Teams: Satin, Silk
	700 (B12)		No[3]			
	780 (B13)					
	790 (B14)					
	850 (B5)					
	850 (B26)					
	1700 (B4)					
	1700 (B66)					
	1900 (B2)					
	1900 (B25)					
	2300 (B30)					
	2500 (B7)					
LTE (TDD)	2600 (B38)	VD	No[3]	Yes: NR, WIFI or BT	VoLTE[1], Google Duo[2], MS Teams[2]	VoLTE: NB AMR, WB AMR, EVS Google Duo: OPUS MS Teams: Satin, Silk
	2600 (B41)					
	3600 (B48)					
NR (FDD)	680 (n71)	VD	No[3]	Yes: LTE, WIFI or BT	Google Duo[2], MS Teams[2]	Google Duo: OPUS MS Teams: Satin, Silk
	850 (n5)		No[3]			
	1700 (n66)					
	1900 (n2)					
	1900 (n25)					
NR (TDD)	2600 (n41)	VD	No[3]	Yes: LTE, WIFI or BT	Google Duo[2], MS Teams[2]	Google Duo: OPUS MS Teams: Satin, Silk
	3700 (n77)		No[3]			
	28000 (n261)		No[3]			
	39000 (n260)					
WIFI	2450	VD	No[3]	Yes: GSM, UMTS, LTE, or NR	VoLTE[1], Google Duo[2], MS Teams[2]	VoWIFI: NB AMR, WB AMR, EVS Google Duo: OPUS MS Teams: Satin, Silk
	5200 (U-NII 1)					
	5300 (U-NII 2A)					
	5500 (U-NII 2C)					
	5800 (U-NII 3)					
BT	2450	DT	No	Yes: GSM, UMTS, LTE, or NR	N/A	N/A

Type Transport
VO = Voice Only
DT = Digital Data - Not intended for Voice Services
VD = CMRS and/or IP Voice over Data Transport

Notes:
1. Reference level in accordance with 7.4.2.1 of ANSI C63.19-2011 and July 2012 C63 VoLTE Interpretation.
2. Reference level is -20dBm0 in accordance with FCC KDB 285076 D02
3. This report only pertains to the evaluation of GSM voice modes and GPRS data modes with the WPT sleeve accessory. Please refer to the Original certification report (Report S/N: 1M2105060048-19.C3K) and Previous Class II Permissive Change Test Report (Report S/N: 1M2109100105-01.C3K) for full test data.

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3. ANSI C63.19-2011 PERFORMANCE CATEGORIES

I. MAGNETIC COUPLING

Axial and Radial Field Intensity

All orientations of the magnetic field, in the axial and radial position along the measurement plane shall be ≥ -18 dB(A/m) at 1 kHz in a 1/3 octave band filter per §8.3.1.

Frequency Response

The frequency response of the axial component of the magnetic field shall follow the response curve specified in EIA RS-504-1983, over the frequency range 300 Hz – 3000 Hz per §8.3.2.

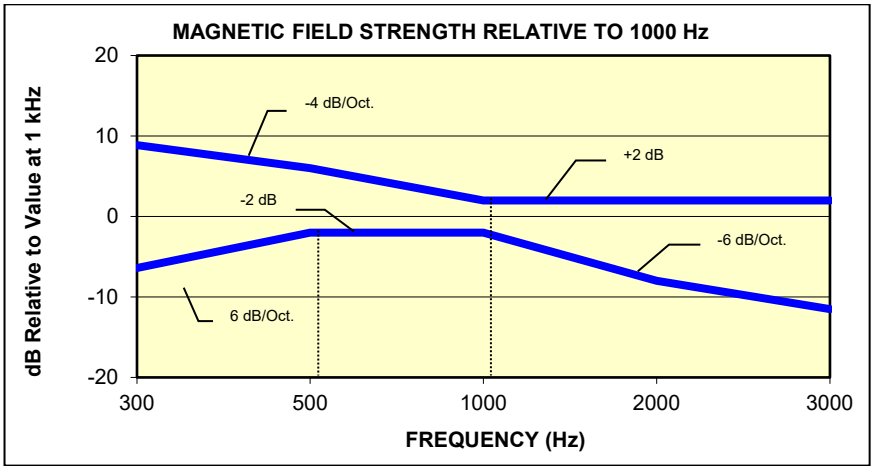

Figure 3-1
Magnetic field frequency response for Wireless Devices with an axial field ≤-15 dB(A/m) at 1 kHz

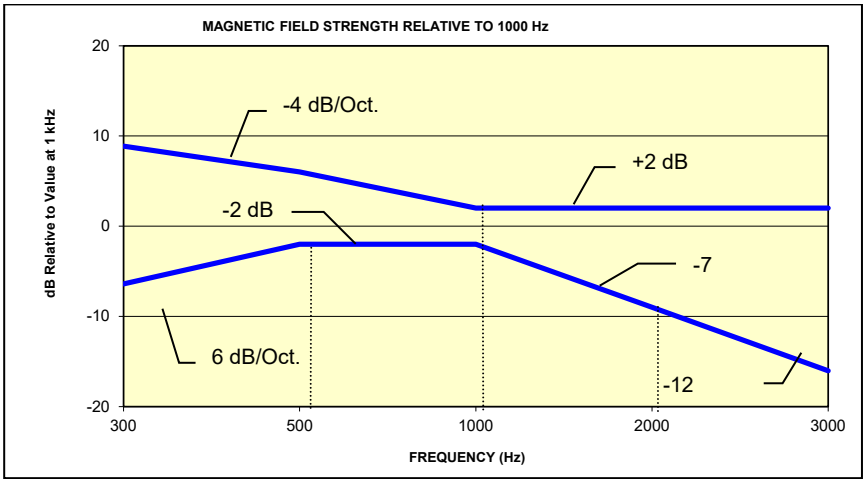

Figure 3-2
Magnetic Field frequency response for wireless devices with an axial field that exceeds -15 dB(A/m) at 1 kHz

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Signal Quality

The table below provides the signal quality requirement for the intended audio magnetic signal from a wireless device. Only the RF immunity of the hearing aid is measured in T-coil mode. It is assumed that a hearing aid can have no immunity to an interference signal in the audio band, which is the intended reception band for this mode. The only criterion that can be measured is the RF immunity in T-coil mode. This is measured using the same procedure as the audio coupling mode at the same levels.

The signal quality of the axial and radial components of the magnetic field was used to determine the T-coil mode category.

Category	Telephone RF Parameters
	Wireless Device Signal Quality [(Signal + Noise)-to-noise ratio in dB]
T1	0 to 10 dB
T2	10 to 20 dB
T3	20 to 30 dB
T4	> 30 dB

Table 3-1
Magnetic Coupling Parameters

Note: The FCC limit for SNNR is 20dB and the test data margins will indicate a margin from the FCC limit for compliance.

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4. METHOD OF MEASUREMENT

I. Test Setup

The equipment was connected as shown in an acoustic/RF hemi-anechoic chamber:

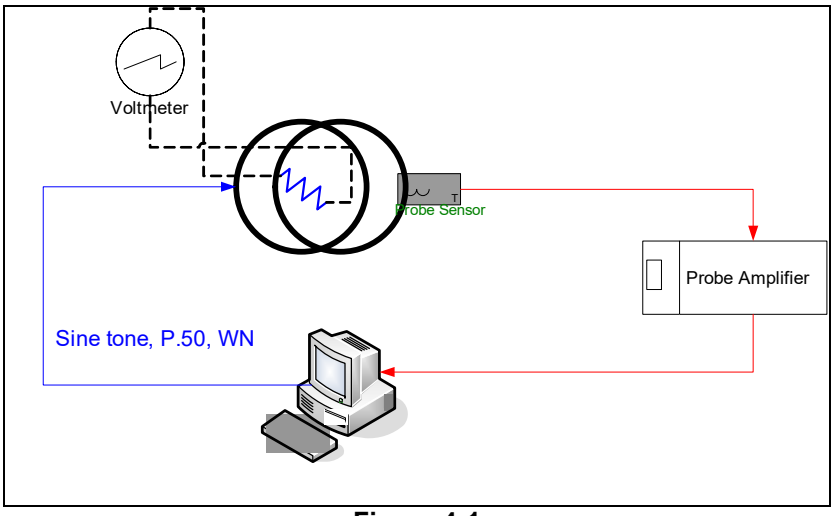

Figure 4-1
Validation Setup with Helmholtz Coil

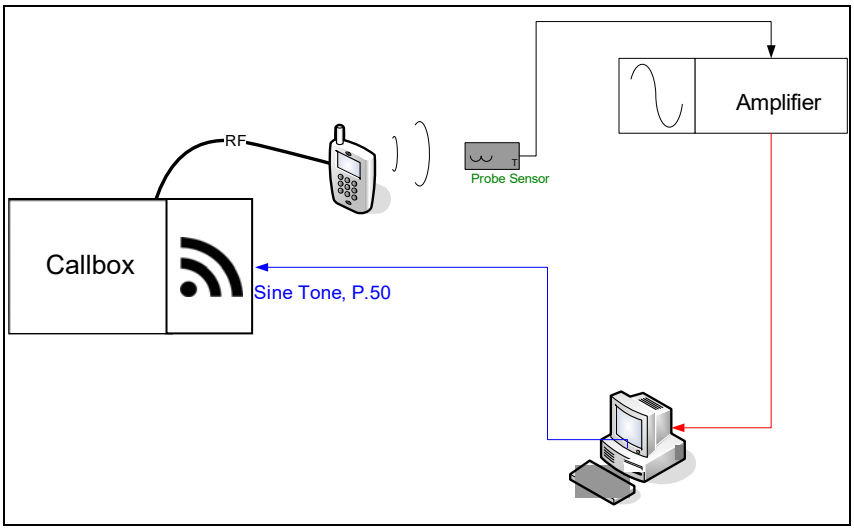

Figure 4-2
T-Coil Test Setup

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II. Scanning Mechanism

Manufacturer:	TEM
Accuracy:	± 0.83 cm/meter
Minimum Step Size:	0.1 mm
Maximum speed	6.1 cm/sec
Line Voltage:	115 VAC
Line Frequency:	60 Hz
Material Composite:	Delrin (Acetal)
Data Control:	Parallel Port
Dynamic Range (X-Y-Z):	45 x 31.75 x 47 cm
Dimensions:	36” x 25” x 38”
Operating Area:	36” x 49” x 55”
Reflections:	< -20 dB (in anechoic chamber)

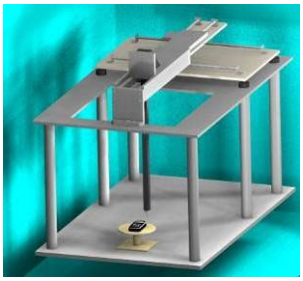

Figure 4-3
RF Near-Field Scanner

III. ITU-T P.50 Artificial Voice

Manufacturer:	ITU-T
Active Frequency Range:	100 Hz – 8 kHz
Stimulus Type:	Male and Female, no spaces
Single Sample Duration:	20.96 seconds
Activity Level:	100%

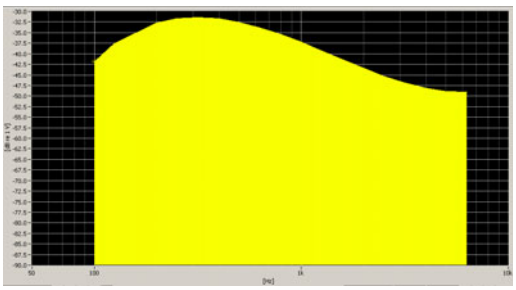

Figure 4-4
Spectral Characteristic of full P.50

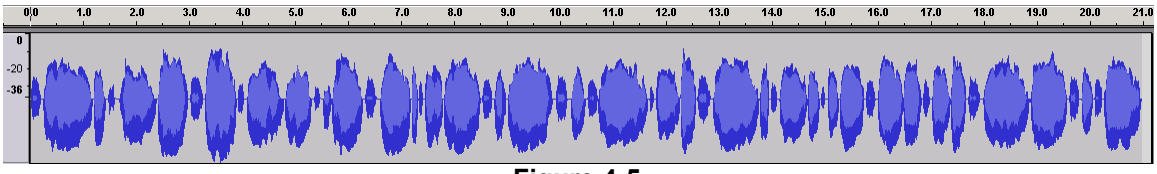

Figure 4-5
Temporal Characteristic of full P.50

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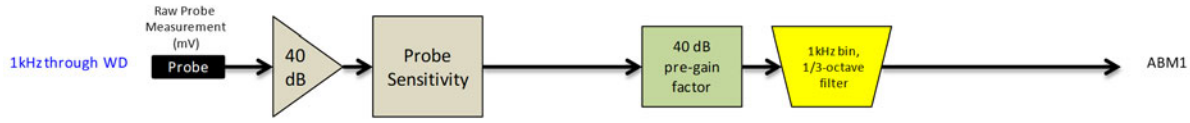
ABM1 Measurement Block Diagram:



ABM2 Measurement Block Diagram:

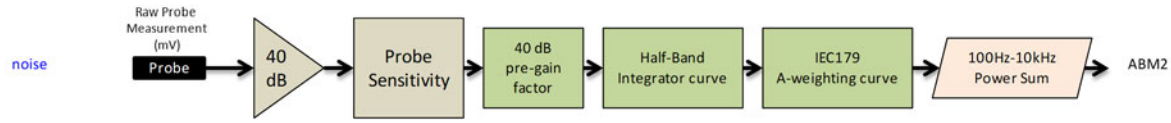


Figure 4-6 Magnetic Measurement Processing Steps

IV. Test Procedure

1. Ambient Noise Check per C63.19 §7.3.1
   a. Ambient interference was monitored using a Real-Time Analyzer between 100-10,000 Hz with 1/3 octave filtering.
   b. "A-weighting" and Half-Band Integration was applied to the measurements.
   c. Since this measurement was measured in the same method as ABM2 measurements, this level was verified to be more than 10 dB below the lowest measurement signal (which is the highest ABM2 measurement for a T4 WD). Therefore the maximum noise level for a T4 WD with an ABM1 = -18 dBA/m is:

      -18 - 30 - 10= -58 dBA/m

2. Measurement System Validation (See Figure 4-1)
   a. The measurement system including the probe, pre-amplifier and acquisition system were validated as an entire system to ensure the reliability of test measurements.
   b. ABM1 Validation

      The magnetic field at the center of the Helmholtz coil is given by the equation (per C63.19 Annex D.10.1):

$$H_c = \frac{NI}{r\sqrt{1.25^3}} = \frac{N(\frac{V}{R})}{r\sqrt{1.25^3}}$$

      Where H_c = magnetic field strength in amperes per meter
      N = number of turns per coil

      For the Helmholtz Coil, N=20; r=0.08m; R=10.2Ω and using V=18mV:

$$H_c = \frac{20\cdot(\frac{0.018}{10.2})}{0.08\cdot\sqrt{1.25^3}} = 0.316A/m \approx -10dB(A/m)$$

      Therefore a pure tone of 1kHz was applied into the coils such that 18mV was observed across the resistor. The voltmeter used for measurement was verified to be capable of measurements in the audio band range. This theoretically generates an expected field of -10 dB(A/m) in the center of the Helmholtz coil which was used to validate the probe measurement at -10dB(A/m). This was verified to be within ± 0.5 dB of the -10dB(A/m) value (see Page 20).

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c. Frequency Response Validation

The frequency response through the Helmholtz Coil was verified to be within 0.5 dB relative to 1kHz, between 300 – 3000 Hz using the P.50 signal as shown below:

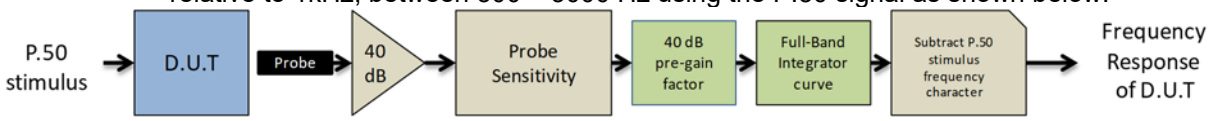

Figure 4-7 Frequency Response Validation

d. ABM2 Measurement Validation

WD noise measurements are filtered with A-weighting and Half-Band Integration over a frequency range of 100Hz – 10kHz to process ABM2 measurements. Below is the verification of the system processing A-weighting and Half-Band integration between system input to output within 0.5 dB of the theoretical result:

Table 4-1
ABM2 Frequency Response Validation

f (Hz)	HBI, A - Measured (dB re 1kHz)	HBI, A - Theoretical (dB re 1kHz)	dB Var.
100	-16.180	-16.170	-0.010
125	-13.257	-13.250	-0.007
160	-10.347	-10.340	-0.007
200	-8.017	-8.010	-0.007
250	-5.925	-5.920	-0.005
315	-4.045	-4.040	-0.005
400	-2.405	-2.400	-0.005
500	-1.212	-1.210	-0.002
630	-0.349	-0.350	0.001
800	0.071	0.070	0.001
1000	0.000	0.000	0.000
1250	-0.503	-0.500	-0.003
1600	-1.513	-1.510	-0.003
2000	-2.778	-2.780	0.002
2500	-4.316	-4.320	0.004
3150	-6.166	-6.170	0.004
4000	-8.322	-8.330	0.008
5000	-10.573	-10.590	0.017
6300	-13.178	-13.200	0.022
8000	-16.241	-16.270	0.029
10000	-19.495	-19.520	0.025

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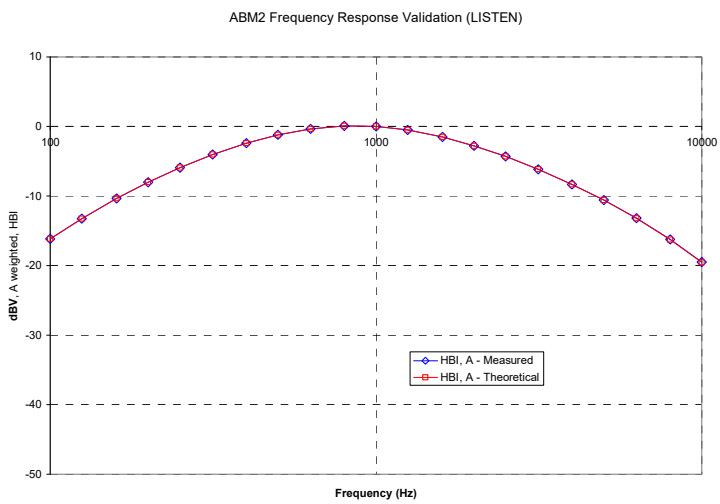

Figure 4-8
ABM2 Frequency Response Validation

The ABM2 result is a power sum from 100Hz to 10kHz with half-band integration and A-weighting. To verify the power sum measurement, a power sum over the full band was measured and verified to track with the source level (See Figure 4-9). Therefore the setup in this step was used to verify the power sum post-processing for ABM2 measurements. See below block diagram:

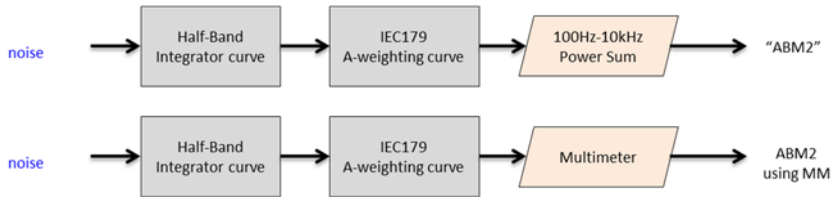

Figure 4-9
ABM2 Validation Block Diagram

The power summed output results for a known input were compared to the multi-meter results to verify any deviation in the post-processing implemented with the power-sum.

Table 4-2
ABM2 Power Sum Validation

WN Input (dBV)	Power Sum (dBV)	Multimeter-Full (dBV)	Dev (dB)
-60	-60.36	-60.2	0.16
-50	-50.19	-50.13	0.06
-40	-40.14	-40.03	0.11
-30	-30.13	-30.01	0.12
-20	-20.12	-20	0.12
-10	-10.14	-10	0.14

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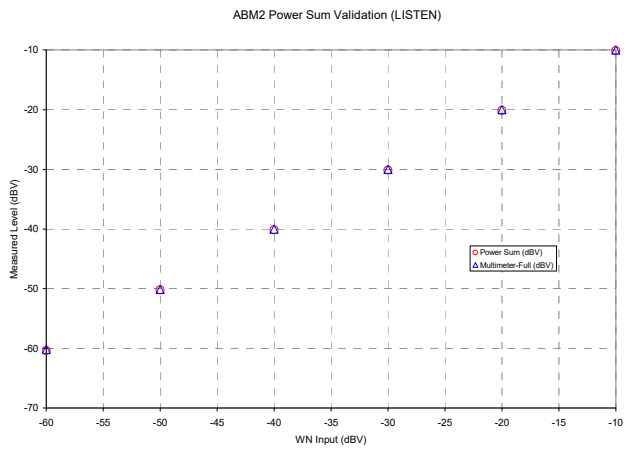

Figure 4-10
ABM2 Power Sum Validation

3. Measurement Test Setup
    a. Fine scan above the WD (TEM)
        i. A multitone signal was applied to the handset such that the phone acoustic output was stable within 1dB over the probe settling time and with the acoustic output level at the C63.19 specified levels (below). The measurement step size was in 2 mm increments at a distance of 10 mm between the surface of the wireless device as shown below (note that in Figure 4-12, the grid is not to scale but merely a graphical representation of the coordinate system in use):

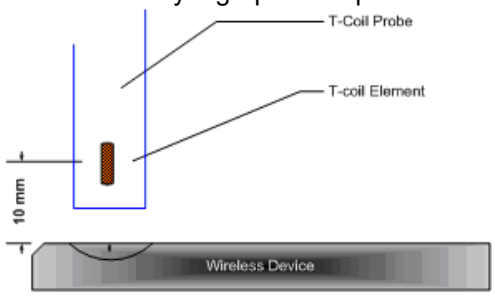

Figure 4-11
Measurement Distance

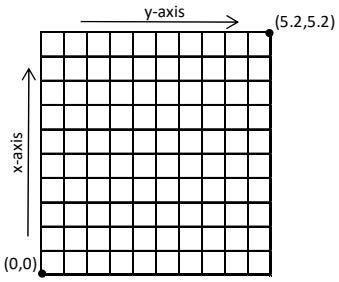

Figure 4-12
Measurement Grid

        ii. After scanning, the planar field maximum point was determined. The position of the probe was moved to this location to setup the test using the SoundCheck system.
        iii. These steps were repeated for all T-coil orientations (axial and radial) per Figure 4-14 after a T-coil orientation was fully measured with the SoundCheck system.
    b. Speech Signal Setup to Base Station Simulator
        i. C63.19 Table 7-1 states audio reference input levels for various technologies:

Standard	Technology	Input Level (dBm0)
TIA/EIA/IS-2000	CDMA	-18
J-STD-007	GSM (217)	-16
T1/T1P1/3GPP	UMTS (WCDMA)	-16
iDEN™	TDMA (22 and 11 Hz)	-18

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ii. See Section 5 for more information regarding audio level settings for Over-The-Top (OTT) Voice Over IP (VoIP) Testing.

c. Real-Time Analyzer (RTA)

i. The Real-Time Analyzer was configured to analyze measurements using 1/3 Octave band weighted filtering.

d. WD Radio Configuration Selection

i. Supported GSM vocoders were investigated for the worst-case ABM2 condition. GSM-EFR was deemed the worst-case condition for the GSM air interface.

4. Signal Quality Data Analysis

a. Narrow-band Magnetic Intensity

i. The standard specifies a 1kHz 1/3 octave band minimum field intensity for a sine tone. The ABM1 measurements were evaluated at 1kHz with 1/3 octave band filtering over an averaged period of 10 seconds.

b. Frequency Response

i. The appropriate frequency response curve was measured to curves in Figure 3-1 or Figure 3-2 between 300 – 3000 Hz using digital linear averaging (limit lines chosen according to measurement found in step 4a). A linear average over 3x the length of the artificial voice signal (3x sampling) was performed. A 10 second delay was configured in the measurement process of the stimulus to ensure handset vocoder latency effects and echo cancellation devices (if any) were appropriately stabilized during measurements.

ii. The appropriate post-processing was applied according to the system processing chain illustrated in Figure 4-7. All R10 frequencies were plotted with respect to 0dB at 1kHz value and aligned with respect to the EIA-504 mask.

iii. The margin is represented by the closest measured data point on the curve to the EIA-504 limit lines, in dB.

c. Signal Quality Index

i. Ensuring the WD was at maximum RF power, maximum volume, backlight off, display on, maximum contrast setting, keypad lights on (when possible) with no audio signal through the vocoder, the WD was measured over at least 100 Hz – 10,000 Hz, maximized over 5 seconds with a 50ms sample time for the ABM2 measurement (5 second time period is used in noise measurements under standards such as IEEE 269, etc.).

ii. After applying half-band integration and A-weighting to the result, a power sum was applied over each 1/3 octave bandwidth frequency for an ABM2 value.

iii. This result was subtracted from the ABM1 result in step a, to obtain the Signal Quality.

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V. Test Setup

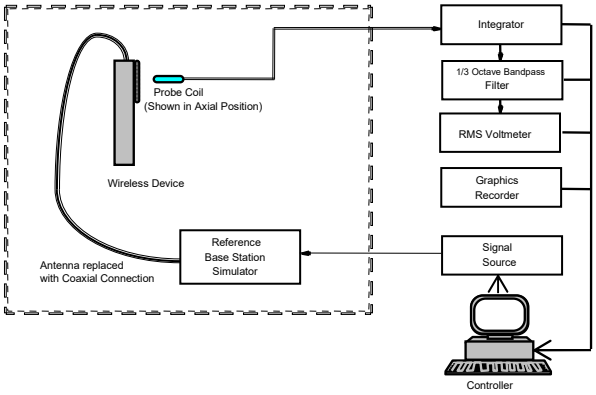

Figure 4-13
Audio Magnetic Field Test Setup

Environmental conditions such as temperature and relative humidity are monitored to ensure there are no impacts on system specifications. Proper voltage and power line frequency conditions are maintained with three phase power sources. Environmental noise and reflections are monitored through system checks.

VI. Deviation from C63.19 Test Procedure

Non-conducted RF connection due to inaccessibility of RF ports with battery installed.

VII. Air Interface Technologies Tested

All air interfaces which support voice capabilities over a managed CMRS or pre-installed OTT VoIP applications were tested for T-coil unless otherwise noted. See Table 2-1 for more details regarding which modes were tested.

VIII. Wireless Device Channels and Frequencies

1. 2G/3G Modes

The frequencies listed in the table below are those that lie in the center of the bands used for cellular telephony. Please refer to the Original Certification for full evaluation on 2G/3G mode.

Table 4-3
Center Channels and Frequencies

Test frequencies & associated channels	
Channel	**Frequency (MHz)**
Cellular 850	
190 (GSM)	**836.60**

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IX. Test Flow

The flow diagram below was followed (From C63.19):

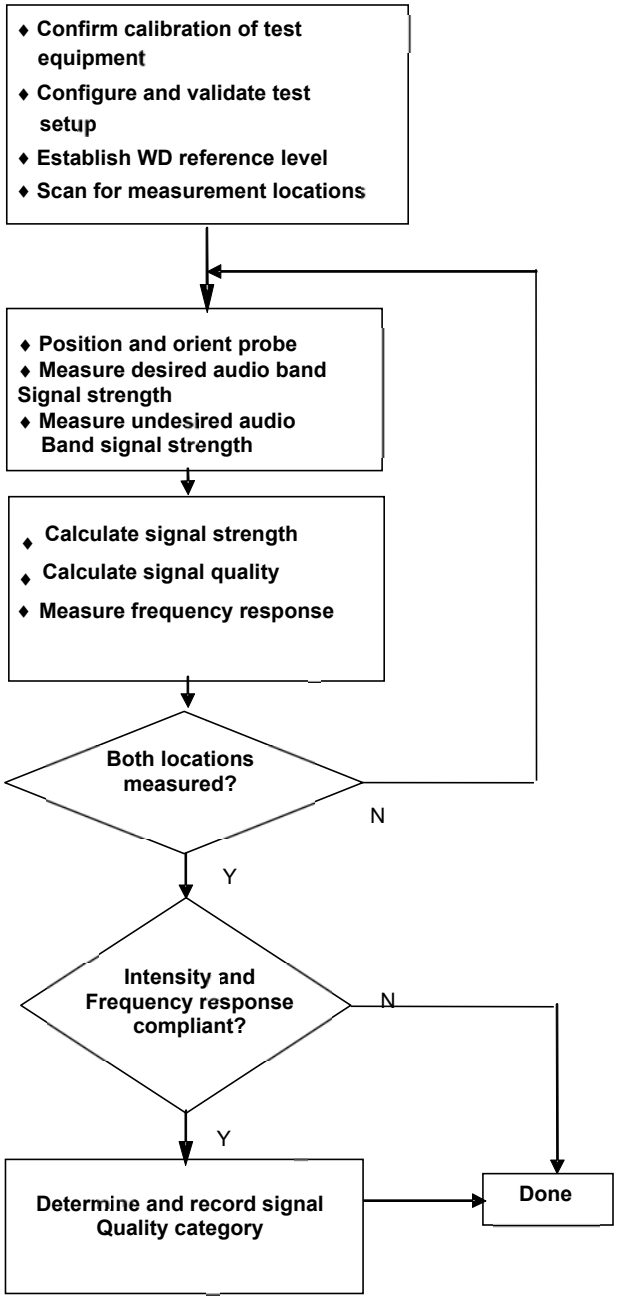

Figure 4-14
C63.19 T-Coil Signal Test Process

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5. OTT VOIP TEST SYSTEM AND DUT CONFIGURATION

I. Test System Setup for OTT VoIP T-Coil Testing

1. OTT VoIP Application

   MS Teams is a pre-installed application on the DUT which allows for VoIP calls in a held-to-ear scenario. Teams uses the Satin audio codec which supports a bitrate range of 6kb/s to 13kb/s and the Silk audio codec which supports a bitrate range of 6kb/s to 36kb/s. All air interfaces capable of a data connection were evaluated with MS Teams.

2. Equipment Setup

   A CMW500 callbox was used to perform OTT VoIP T-coil measurements. The Data Application Unit (DAU) of the CMW500 was connected to the internet and allowed for an IP data connection on the DUT. An auxiliary VoIP unit was used to initiate an OTT VoIP call to the DUT. The auxiliary VoIP unit allowed for the configuration and monitoring of the OTT VoIP codec bitrate during a call. Both high and low bitrate settings were evaluated in to determine the worst-case configuration.

3. Audio Level Settings

   According to KDB 285076 D02, the average speech level of -20dBm0 shall be used for protocols not specifically listed in Table 7.1 of ANSI C63.19-2011 or the ANSI C63.19-2011 VoLTE interpretation[2]. The auxiliary VoIP unit allowed for monitoring the signal input level to ensure that the settings for speech input and full scale levels resulted in the -20dBm0 speech input level to the DUT for the OTT VoIP call.

   Note: The green highlighted text is approved by FCC under the TCB PAG Re-Use Policy 388624 D01 IV. D. for T-Coil Testing for WI-FI calling and MS Teams.

II. DUT Configuration for OTT VoIP T-Coil Testing

1. Codec Configuration

An investigation was performed with the Satin and Silk codecs across all bitrates to determine the audio codec configuration to be used for testing. The effects of codec configuration were found to be independent of radio configuration; therefore, only one radio configuration for each applicable data mode was used for these investigations. The Satin 10kbps setting was used for the audio codec on the auxiliary VoIP unit for OTT VoIP T-Coil testing. See Class II Permissive change test report (Report S/N: 1M2109100105-01.C3K) for full evaluation on OTT VoIP T-Coil Testing.

[2] FCC Office of Engineering and Technology KDB, "285076 D02 T-Coil Testing for CMRS IP v03," September 13, 2017

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6. T-COIL TEST SUMMARY

Table 6-1
Consolidated Tabled Results

		Freq. Response Margin		Magnetic Intensity Verdict		FCC SNNR Verdict		Margin from FCC Limit (dB)	C63.19-2011 Rating
C63.19 Section		8.3.2		8.3.1		8.3.4			
		Axial	Radial	Axial	Radial	Axial	Radial		
GSM (South - Flip)	Cellular	PASS	NA	PASS	PASS	PASS	PASS	-5.85	T3
GSM (South - Flat)	Cellular	PASS	NA	PASS	PASS	PASS	PASS	-5.45	T3
EDGE (OTT VoIP) (South - Flip)	Cellular	PASS	NA	PASS	PASS	PASS	PASS	-1.01	T3

I. Raw Handset Data

Table 6-2
Raw Data Results for GSM (Flip Posture)

Mode	Orientation	Channel	Device SN	Accessory	ABM1 [dB(A/m)]	ABM2 [dB(A/m)]	Ambient Noise [dB(A/m)]	Frequency Response Margin (dB)	S+N/N (dB)	FCC Limit (dB)	Margin from FCC Limit (dB)	C63.19-2011 Rating	Test Coordinates
GSM850	Axial	251	18766	WPT Sleeve	-7.73	-33.58	-60.72	0.76	25.85	20.00	-5.85	T3	0.8, 2.8

Table 6-3
Raw Data Results for GSM (Flat Posture)

Mode	Orientation	Channel	Device SN	Accessory	ABM1 [dB(A/m)]	ABM2 [dB(A/m)]	Ambient Noise [dB(A/m)]	Frequency Response Margin (dB)	S+N/N (dB)	FCC Limit (dB)	Margin from FCC Limit (dB)	C63.19-2011 Rating	Test Coordinates
GSM850	Axial	190	18766	WPT Sleeve	3.52	-22.19	-60.72	0.90	25.71	20.00	-5.71	T3	1.2, 3.8
	Radial	128	18766	WPT Sleeve	-3.08	-28.53	-61.13	N/A	25.45	20.00	-5.45	T3	2.0, 4.4

Table 6-4
Raw Data Results for GPRS (OTT VoIP) (Flip Posture)

Mode	Orientation	Channel	Device SN	Accessory	ABM1 [dB(A/m)]	ABM2 [dB(A/m)]	Ambient Noise [dB(A/m)]	Frequency Response Margin (dB)	S+N/N (dB)	FCC Limit (dB)	Margin from FCC Limit (dB)	C63.19-2011 Rating	Test Coordinates
GPRS850	Radial	190	51385	WPT Sleeve	-0.03	-21.04	-61.13	N/A	21.01	20.00	-1.01	T3	1.6, 3.0

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II. Test Notes

A. General

1. Phone Condition: Mute on; Backlight off; Max Volume; Max Contrast
2. 'Radial' orientation refers to radial transverse.
3. Hearing Aid Mode (**Phone→Call Settings→Accessibility→Hearing aids**) was set to ON for Frequency Response compliance
4. Speech Signal: ITU-T P.50 Artificial Voice
5. Bluetooth and WIFI were disabled while testing 2G modes.
6. The Margin from FCC limit column indicates a margin from the FCC limit for compliance (T3).

B. GSM

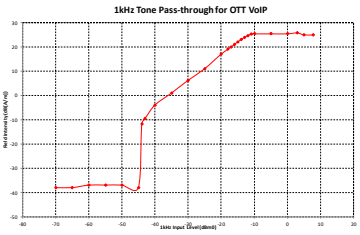
1. Power Configuration: GSM850: PCL=5;
2. Vocoder Configuration: EFR (GSM);

C. OTT VoIP

1. Vocoder Configuration: Satin, 10kbps
2. GPRS Configuration
    a. Coding Scheme: CS-4
    b. Number of TX slots: 2

III. 1 kHz Vocoder Application Check

This model was verified to be within the linear region for ABM1 measurements at -16 dBm0 for GSM. This measurement was taken in the axial configuration above the maximum location.



This model was verified to be within the linear region for ABM1 measurements at -20 dBm0 for OTT VoIP. This measurement was taken in the axial configuration above the maximum location.

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IV. T-Coil Validation Test Results

Table 6-5
Helmholtz Coil Validation Table of Results

Item	Target	Result	Verdict
Axial			
Magnetic Intensity, -10 dBA/m	*-10 ± 0.5 dB*	-10.227	**PASS**
Environmental Noise	< -58 dBA/m	-60.72	**PASS**
Frequency Response, from limits	*> 0 dB*	0.70	**PASS**
Radial			
Magnetic Intensity, -10 dBA/m	*-10 ± 0.5 dB*	-10.132	**PASS**
Environmental Noise	< -58 dBA/m	-61.13	**PASS**
Frequency Response, from limits	*> 0 dB*	0.70	**PASS**

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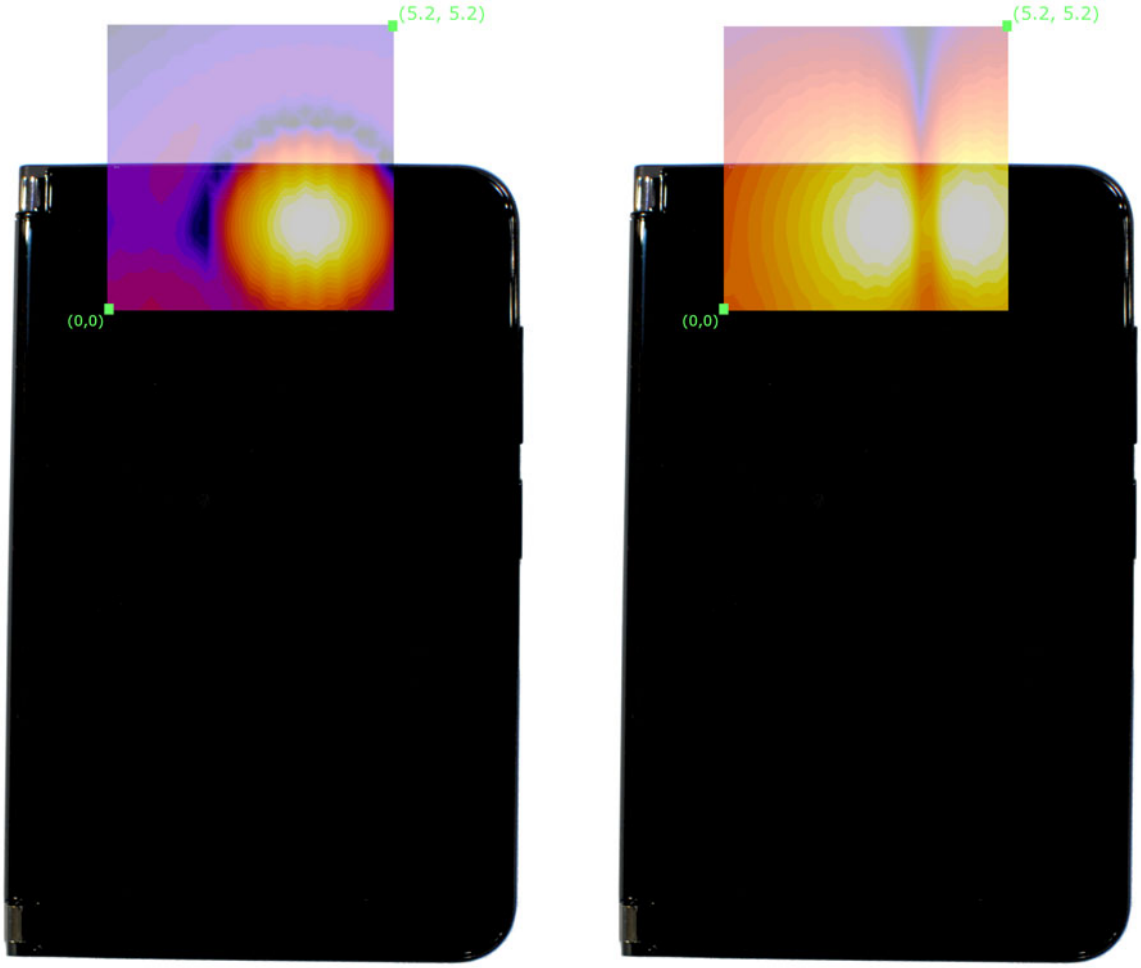
V. ABM1 Magnetic Field Distribution Scan Overlays



Axial Radial (Transverse)

Figure 6-1
T-Coil Scan Overlay Magnetic Field Distributions

Notes:
1. Final measurement locations are indicated in the raw data tables.
2. See Test Setup Photographs for actual WD overlay.

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7. MEASUREMENT UNCERTAINTY

Table 7-1
Uncertainty Estimation Table

Contribution	Data +/- %	Data +/- dB	Data Type	Probability distribution	Divisor	Standard uncertainty	Standard Uncertainty (dB)
ABM Noise	7.0%	0.29	Std. Dev.	Normal k=1	1.00	7.0%	
RF Reflections	4.7%	0.20	Specification	Rectangular	1.73	2.7%	
Reference Signal Level	12.2%	0.50	Specification	Rectangular	1.73	7.0%	
Positioning Accuracy	10.0%	0.41	Uncertainty	Rectangular	1.73	5.8%	
Probe Coil Sensitivity	12.2%	0.50	Specification	Rectangular	1.73	7.0%	
Probe Linearity	2.4%	0.10	Std. Dev.	Normal k=1	1.00	2.4%	
Cable Loss	2.8%	0.12	Specification	Rectangular	1.73	1.6%	
Frequency Analyzer	5.0%	0.21	Specification	Rectangular	1.73	2.9%	
System Repeatability	5.0%	0.21	Std. Dev.	Normal k=1	1.00	5.0%	
WD Repeatability	9.0%	0.37	Std. Dev.	Normal k=1	1.00	9.0%	
Positioner Accuracy	1.0%	0.04	Specification	Rectangular	1.73	0.6%	
Combined standard uncertainty, uc (k=1)						17.7%	0.71
Expanded uncertainty (k=2), 95% confidence level						35.3%	1.31

Notes:
1. Test equipments are calibrated according to techniques outlined in NIS81, NIS3003 and NIST Tech Note 1297.
2. All equipments have traceability according to NIST. Measurement Uncertainties are defined in further detail in NIS 81 and NIST Tech Note 1297 and UKAS M3003.

Measurement uncertainty reflects the quality and accuracy of a measured result as compared to the true value. Such statements are generally required when stating results of measurements so that it is clear to the intended audience that the results may differ when reproduced by different facilities. Measurement results vary due to the measurement uncertainty of the instrumentation, measurement technique, and test engineer. Most uncertainties are calculated using the tolerances of the instrumentation used in the measurement, the measurement setup variability, and the technique used in performing the test. While not generally included, the variability of the equipment under test also figures into the overall measurement uncertainty. Another component of the overall uncertainty is based on the variability of repeated measurements (so-called Type A uncertainty). This may mean that the Hearing Aid compatibility tests may have to be repeated by taking down the test setup and resetting it up so that there are a statistically significant number of repeat measurements to identify the measurement uncertainty. By combining the repeat measurement results with that of the instrumentation chain using the technique contained in NIS 81 and NIS 3003, the overall measurement uncertainty was estimated.

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8. EQUIPMENT LIST

Table 8-1
Equipment List

Manufacturer	Model	Description	Cal Date	Cal Interval	Cal Due	Serial Number
RME	Fireface UC	Acoustic Analyzer External Audio Interface	3/29/2021	Biennial	3/29/2023	23857555
Listen	SoundConnect	Microphone Power Supply	3/29/2021	Biennial	3/29/2023	PS3099
Rohde & Schwarz	CMW500	Radio Communication tester	7/19/2021	Annual	7/19/2022	128635
Rohde & Schwarz	CMW500	Wideband Radio Communication Tester	3/22/2021	Annual	3/22/2022	162125
Rohde & Schwarz	CMW500	Wideband Radio Communication Tester	2/10/2021	Annual	2/10/2022	161662
Seekonk	NC-100	Torque Wrench (8" lb)	8/4/2020	Biennial	8/4/2022	21053
TEM	Axial T-Coil Probe	Axial T-Coil Probe	3/29/2021	Biennial	3/29/2023	TEM-1139
TEM	Radial T-Coil Probe	Radial T-Coil Probe	3/29/2021	Biennial	3/29/2023	TEM-1133
TEM		HAC Positioner	N/A		N/A	N/A
TEM		HAC System Controller with Software	N/A		N/A	N/A
TEM	C63.19	Helmholtz Coil	3/29/2021	Biennial	3/29/2023	925

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9. TEST DATA

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PCTEST Hearing-Aid Compatibility Facility

DUT: HH Coil – SN: 925

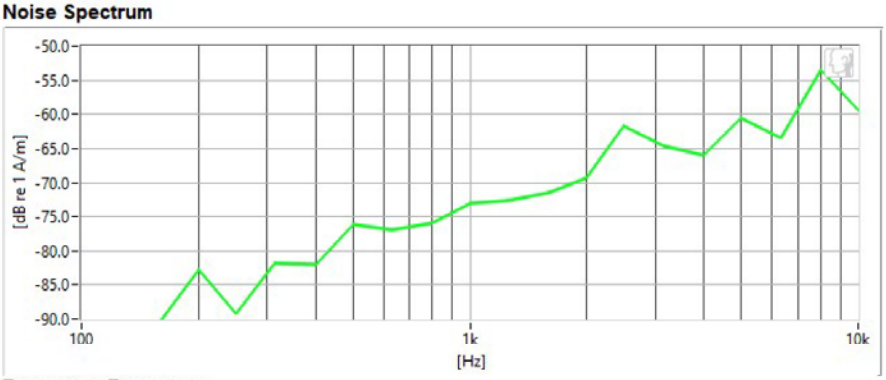
Type: HH Coil
Serial: 925

Measurement Standard: ANSI C63.19-2011

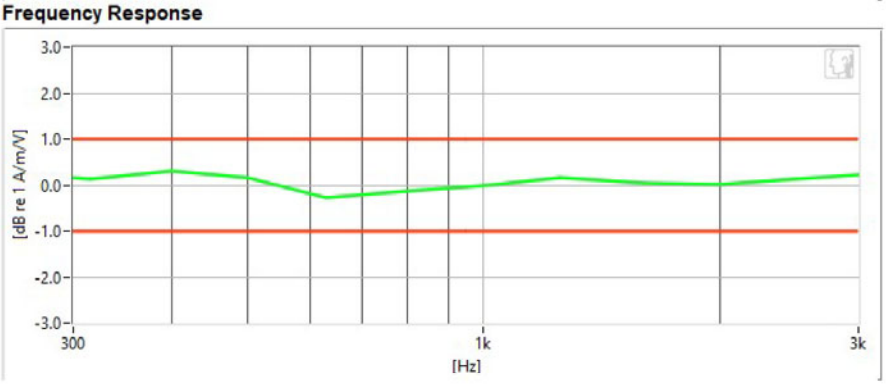
Equipment:

- Probe: Axial T-Coil Probe – SN: TEM-1139; Calibrated: 3/29/2021
- Helmholtz Coil – SN: 925; Calibrated: 3/29/2021

Noise Spectrum



Frequency Response



Results

Verification 1kHz Intensity	-10.227	dB	✓	Max/Min	-9.5/-10.5
Verification ABM2	-60.72	dB	✓	Maximum	-58.0
Frequency Response Margin	700m	dB	✓	Tolerance curves	Aligned Data

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PCTEST Hearing-Aid Compatibility Facility

DUT: HH Coil – SN: 925

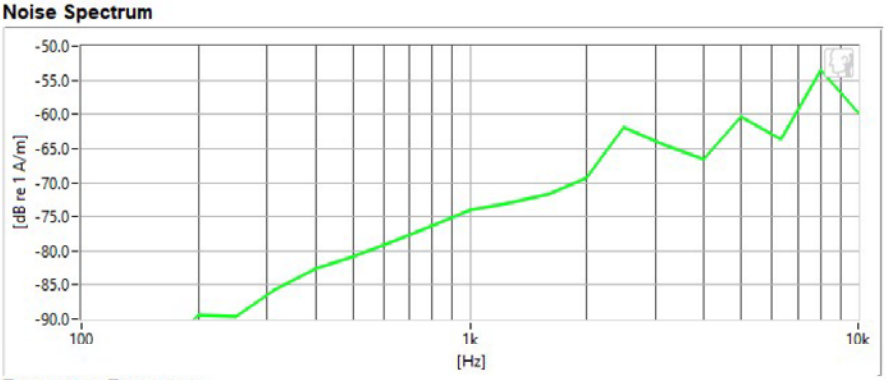
Type: HH Coil
Serial: 925

Measurement Standard: ANSI C63.19-2011

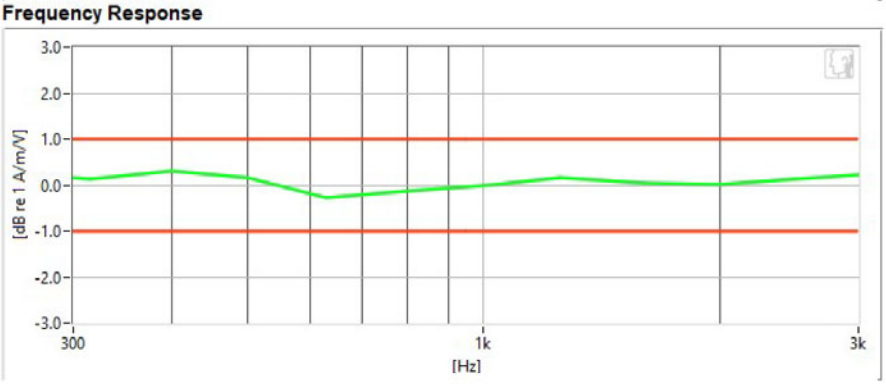
Equipment:

- Probe: Radial T-Coil Probe – SN: TEM-1133; Calibrated: 3/29/2021
- Helmholtz Coil – SN: 925; Calibrated: 3/29/2021

Noise Spectrum



Frequency Response



Results

Verification 1kHz Intensity	-10.132	dB	✓	Max/Min	-9.5/-10.5
Verification ABM2	-61.13	dB	✓	Maximum	-58.0
Frequency Response Margin	700m	dB	✓	Tolerance curves	Aligned Data

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9/27/2021

PCTEST Hearing-Aid Compatibility Facility

DUT: C3K1995

Type: Portable Handset
Serial: 18766

Measurement Standard: ANSI C63.19-2011

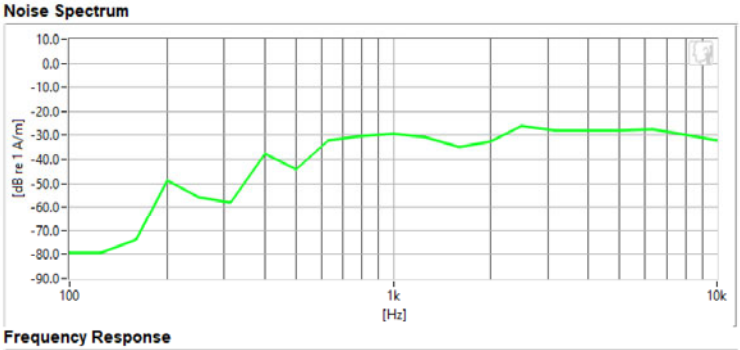
Equipment:

- Probe: Axial T-Coil Probe – SN: TEM-1139; Calibrated: 3/29/2021

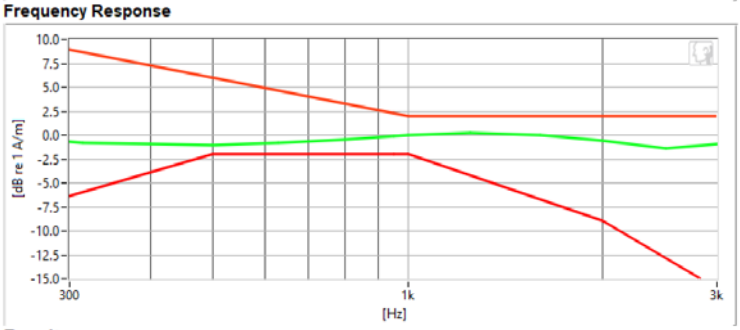
Test Configuration:

- Mode: GSM850
- Channel: 190
- Speech Signal: ITU-T P.50 Artificial Voice
- Accessory: WPT Sleeve
- Device Posture: Flat

Noise Spectrum



Frequency Response



Results

ABM1	3.52 dB	✓	Minimum	-18.0
ABM2	-22.19 dB	✓	Maximum	0.0
SNNR	25.71 dB	✓	Minimum	20.0
Aligned Response - P.50	900m dB	✓	Tolerance curves	Aligned Data

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9/27/2021

PCTEST Hearing-Aid Compatibility Facility

DUT: C3K1995

Type: Portable Handset
Serial: 51385

Measurement Standard: ANSI C63.19-2011

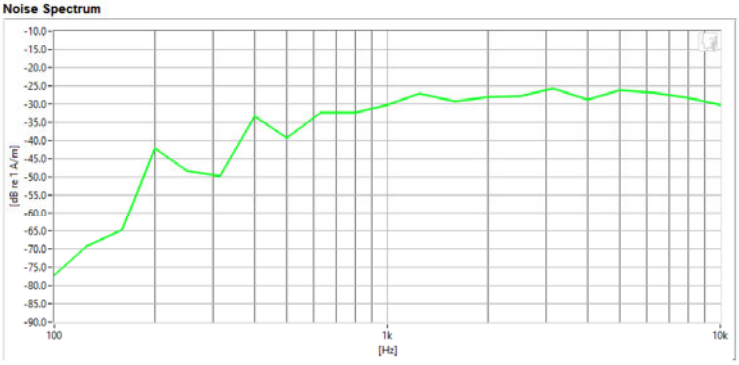
Equipment:

- Probe: Radial T-Coil Probe – SN: TEM-1133; Calibrated: 3/29/2021

Test Configuration:

- VoIP Application: MS Teams
- Mode: GPRS850
- Channel: 190
- Accessory: WPT Sleeve
- Device Posture: Flip

Noise Spectrum



Results

ABM1	-30m dB	✓	Minimum	-18.0
ABM2	-21.04 dB	✓	Maximum	0.0
SNNR	21.01 dB	✓	Minimum	20.0

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10. CALIBRATION CERTIFICATES

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West Caldwell Calibration Laboratories Inc.

Certificate of Calibration

for

AXIAL T COIL PROBE

Manufactured by:	TEM CONSULTING, LP
Model No:	AXIAL T COIL PROBE
Serial No:	TEM-1139
Calibration Recall No:	31813

VaA
4/7/2021

Submitted By:

Customer:	ANDREW HARWELL
Company:	PCTEST ENGINEERING LAB
Address:	7185 OAKLAND MILLS ROAD COLUMBIA MD 21046

The subject instrument was calibrated to the indicated specification using standards traceable to the SI through the National Institute of Standards and Technology or to accepted values of natural physical constants. This document certifies that the instrument met the following specification upon its return to the submitter.

West Caldwell Calibration Laboratories Procedure No. AXIAL T C TEM C

Upon receipt for Calibration, the instrument was found to be:

Within (X)

tolerance of the indicated specification. See attached Report of Calibration.
The information supplied relates to the calibrated item listed above and statement of conformance for ALL given specifications and standards fall under the decision rule: A= (L-(U95)*M), where A is acceptance limit, L is manufacturer specifications, U95 is confidence level of 95% at k=2, and M is managed guard-band mulitiplier. The guard-band multiplier increases false-accept risk in favor of decreasing false-reject risk. Although the false accept risk increases, it is still below the Z540.3 2% risk requirement. The decision rule has been communicated and approved by customer during contract review.

West Caldwell Calibration Laboratories' calibration control system meets the following requirements, ISO 10012-1 MIL STD 45662A, ANSI/NCSL Z540-1, IEC Guide 25, ISO 9001:2015, and ISO 17025

Note: With this Certificate, Report of Calibration is included.

Approved by:

James Zhu
Quality Manager
ISO/IEC 17025:2017

Calibration Date: 29-Mar-21

Certificate No: 31813 - 3

QA Doc. #1051 Rev. 3.0 5/29/20

Certificate Page 1 of 1

West Caldwell Calibration Laboratories, Inc.
uncompromised calibration
1575 State Route 96, Victor, NY 14564, U.S.A.

ACCREDITED
Calibration Lab. Cert. # 1533.01

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ISO/IEC 17025: 2017

West Caldwell Calibration Laboratories, Inc.

uncompromised calibration

1575 State Route 96, Victor NY 14564

ACCREDITED

Calibration Lab. Cert. # 1533.01

REPORT OF CALIBRATION

for

TEM Consulting LP Axial T Coil Probe **Model No.: Axial T Coil Probe** **Serial No.: TEM-1139**

Company: PCTest Engineering Lab **I. D. No.: XXXX**

Calibration results:

Probe Sensitivity measured with Helmholtz Coil

Helmholtz Coil; **Before & after data same: ...X...**

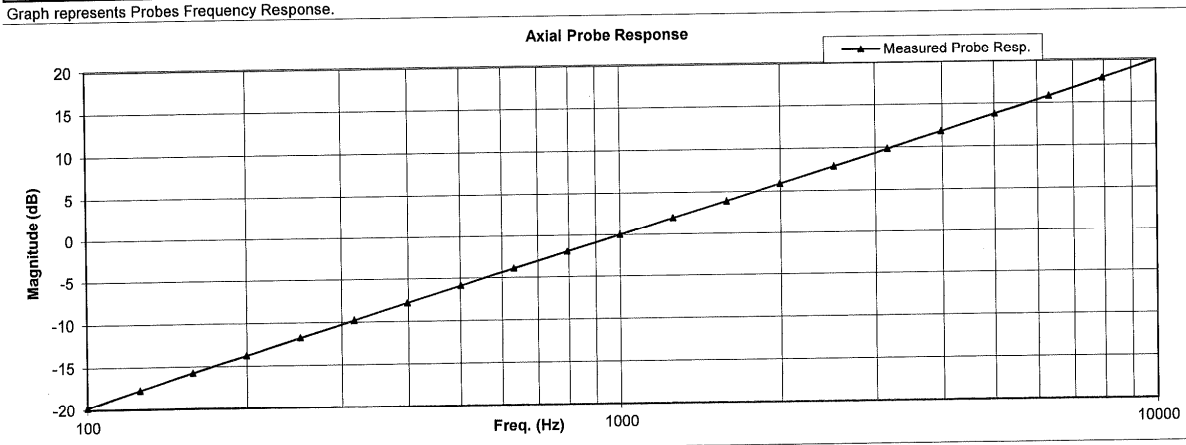
the number of turns on each coil;	10	No.	Laboratory Environment:		
the radius of each coil, in meters;	0.204	m	Ambient Temperature:	20.4	°C
the current in the coils, in amperes.;	0.08	A	Ambient Humidity:	29.3	% RH
Helmholtz Coil Constant;	7.09	A/m/V	Ambient Pressure:	99.394	kPa
Helmholtz Coil magnetic field;	5.92	A/m	Calibration Date:	29-Mar-2021	
Probe Sensitivity at	1000	Hz.	Calibration Due:		
was	-60.26	dBV/A/m	Report Number:	31813 -3	
	0.970	mV/A/m	Control Number:	31813	
Probe resistance	873	Ohms			

The above listed instrument meets or exceeds the tested manufacturer's specifications.

This Calibration is traceable through NIST test numbers: 684.07/O-0000001126-20

The expanded uncertainty of calibration: 0.30dB at 95% confidence level with a coverage factor of k=2.

Graph represents Probes Frequency Response.



The above listed instrument was checked using calibration procedure documented in West Caldwell Calibration Laboratories Inc. procedure : **Rev. 7.0 Jan. 24, 2014 Doc. # 1038 HCATEMC**

Calibration was performed by West Caldwell Calibration Laboratories Inc. under Operating Procedures intended to implement the requirements of ISO10012-1, IEC Guide 25, ANSI/NCSL Z540-1, (MIL-STD-45662A) and ISO 9001:2015, ISO 17025

Cal. Date: 29-Mar-2021 Measurements performed by: .....

Calibrated on WCCL system type 9700 **James Zhu**

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Rev. 7.0 Jan. 24, 2014 Doc. # 1038 HCATEMC

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HCATEMC_TEM-1139_Mar-29-2021.xls

West Caldwell Calibration Laboratories Inc.

1575 State Route 96, Victor NY 14564
Tel. (585) 586-3900 FAX (585) 586-4327

Calibration Data Record

for

TEM Consulting LP Axial T Coil Probe — Model No.: Axial T Coil Probe — Serial No.: TEM-1139
Company: PCTest Engineering Lab

Test	Function		Tolerance		Measured values Before	Out	Remarks
1.0	Probe Sensitivity at	1000 Hz.		dBV/A/m	-60.26		
				dB			
2.0	Probe Level Linearity			6	5.94		
			Ref. (0 dB)	0	0.00		
				-6	-6.03		
				-12	-12.04		
				Hz			
3.0	Probe Frequency Response			100	-19.8		
				126	-17.8		
				158	-15.7		
				200	-13.8		
				251	-11.8		
				316	-9.8		
				398	-7.8		
				501	-5.9		
				631	-3.9		
				794	-2.0		
			Ref. (0 dB)	1000	0.0		
				1259	2.0		
				1585	3.9		
				1995	5.9		
				2512	7.9		
				3162	9.8		
				3981	11.8		
				5012	13.8		
				6310	15.8		
				7943	17.9		
				10000	20.0		

Instruments used for calibration:			Date of Cal.	Traceablity No.	Due Date
HP	34401A	S/N US360641	2-Jul-2020	,610119	2-Jul-2021
HP	34401A	S/N US361024	2-Jul-2020	,610119	2-Jul-2021
HP	33120A	S/N US360437	2-Jul-2020	,610119	2-Jul-2021
B&K	2133	S/N 1583254	1-Jul-2020	684.07/O-0000001126-20	1-Jul-2021

Cal. Date: 29-Mar-2021 — Tested by: James Zhu

Calibrated on WCCL system type 9700

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West Caldwell Calibration Laboratories Inc.

Certificate of Calibration

for

RADIAL T COIL PROBE

Manufactured by:	TEM CONSULTING, LP
Model No:	RADIAL T COIL PROBE
Serial No:	TEM-1133
Calibration Recall No:	31813

Submitted By:

Customer: ANDREW HARWELL

Company: PCTEST ENGINEERING LAB
Address: 7185 OAKLAND MILLS ROAD
COLUMBIA MD 21046

The subject instrument was calibrated to the indicated specification using standards traceable to the SI through the National Institute of Standards and Technology or to accepted values of natural physical constants. This document certifies that the instrument met the following specification upon its return to the submitter.

West Caldwell Calibration Laboratories Procedure No. RADIAL T TEM C

Upon receipt for Calibration, the instrument was found to be:

Within (X)

tolerance of the indicated specification. See attached Report of Calibration.
The information supplied relates to the calibrated item listed above and statement of conformance for ALL given specifications and standards fall under the decision rule: A= (L-(U95)*M), where A is acceptance limit, L is manufacturer specifications, U95 is confidence level of 95% at k=2, and M is managed guard-band mulitiplier. The guard-band multiplier increases false-accept risk in favor of decreasing false-reject risk. Although the false accept risk increases, it is still below the Z540.3 2% risk requirement. The decision rule has been communicated and approved by customer during contract review.

West Caldwell Calibration Laboratories' calibration control system meets the following requirements, ISO 10012-1 MIL STD 45662A, ANSI/NCSL Z540-1, IEC Guide 25, ISO 9001:2015, and ISO 17025

Note: With this Certificate, Report of Calibration is included.

Approved by:

James Zhu

Quality Manager
ISO/IEC 17025:2017

Calibration Date: 29-Mar-21

Certificate No: 31813 - 2

QA Doc. #1051 Rev. 3.0 5/29/20

Certificate Page 1 of 1

West Caldwell Calibration Laboratories, Inc.
uncompromised calibration
1575 State Route 96, Victor, NY 14564, U.S.A.

ACCREDITED
Calibration Lab. Cert. # 1533.01

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ISO/IEC 17025: 2017

West Caldwell Calibration Laboratories, Inc.

uncompromised calibration

1575 State Route 96, Victor NY 14564

ACCREDITED

Calibration Lab. Cert. # 1533.01

REPORT OF CALIBRATION

for

TEM Consulting LP Radial T Coil Probe **Model No.: Radial T Coil Probe** **Serial No.: TEM-1133**

Company: PCTest Engineering Lab **I. D. No.: XXXX**

Calibration results:

Probe Sensitivity measured with Helmholtz Coil

Before & after data same: ...X...

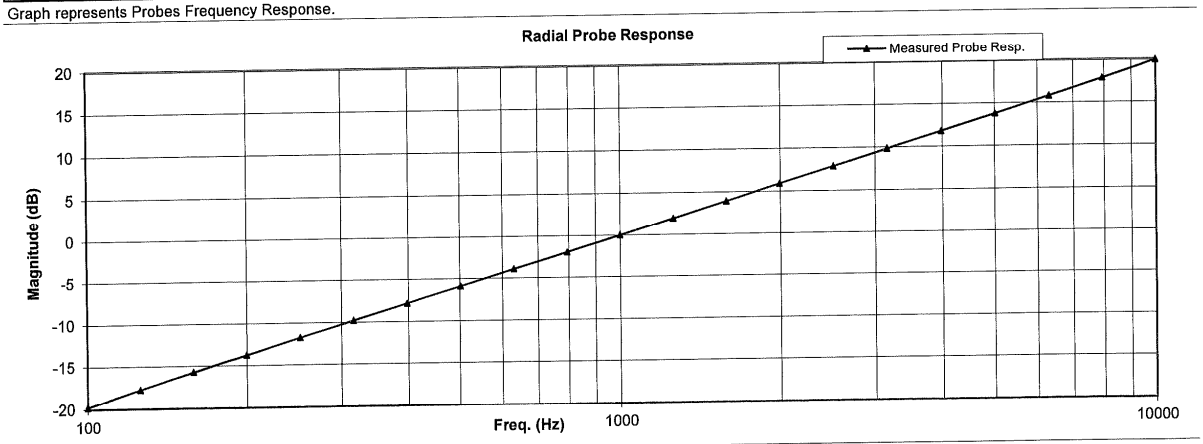
Helmholtz Coil;					
the number of turns on each coil;	10	No.	Laboratory Environment:		
the radius of each coil, in meters;	0.204	m	Ambient Temperature:	20.4	°C
the current in the coils, in amperes.;	0.09	A	Ambient Humidity:	29.3	% RH
Helmholtz Coil Constant;	7.09	A/m/V	Ambient Pressure:	99.394	kPa
Helmholtz Coil magnetic field;	5.97	A/m	Calibration Date:	29-Mar-2021	
Probe Sensitivity at	1000	Hz.	Re-calibration Due:		
was	-60.18	dBV/A/m	Report Number:	31813 -2	
	0.980	mV/A/m	Control Number:	31813	
Probe resistance	896	Ohms			

The above listed instrument meets or exceeds the tested manufacturer's specifications.

This Calibration is traceable through NIST test numbers: 684.07/O-0000001126-20

The expanded uncertainty of calibration: 0.30dB at 95% confidence level with a coverage factor of k=2.

Graph represents Probes Frequency Response.



The above listed instrument was checked using calibration procedure documented in West Caldwell Calibration Laboratories Inc. procedure : **Rev. 7.0 Jan. 24, 2014 Doc. # 1038 HCRTEMC**

Calibration was performed by West Caldwell Calibration Laboratories Inc. under Operating Procedures intended to implement the requirements of ISO10012-1, IEC Guide 25, ANSI/NCSL Z540-1, (MIL-STD-45662A) and ISO 9001:2015, ISO 17025

Cal. Date: 29-Mar-2021 Measurements performed by: .....

James Zhu

Calibrated on WCCL system type 9700

Rev. 7.0 Jan. 24, 2014 Doc. # 1038 HCRTEMC

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HCRTEMC_TEM-1133_Mar-29-2021.xls

West Caldwell Calibration Laboratories Inc.

1575 State Route 96, Victor NY 14564
Tel. (585) 586-3900 FAX (585) 586-4327

Calibration Data Record

for

TEM Consulting LP Radial T Coil Probe — Model No.: Radial T Coil Probe — Serial No.: TEM-1133
Company: PCTest Engineering Lab

Test	Function	Tolerance		Measured values Before	Out	Remarks
1.0	Probe Sensitivity at	1000 Hz.	dBV/A/m	-60.18		
			dB			
2.0	Probe Level Linearity		6	6.04		
		Ref. (0 dB)	0	0.00		
			-6	-6.03		
			-12	-12.06		
			Hz			
3.0	Probe Frequency Response		100	-19.8		
			126	-17.8		
			158	-15.7		
			200	-13.8		
			251	-11.8		
			316	-9.8		
			398	-7.8		
			501	-5.9		
			631	-3.9		
			794	-2.0		
		Ref. (0 dB)	1000	0.0		
			1259	2.0		
			1585	3.9		
			1995	5.9		
			2512	7.8		
			3162	9.8		
			3981	11.8		
			5012	13.8		
			6310	15.8		
			7943	17.8		
			10000	20.0		

Instruments used for calibration:			Date of Cal.	Traceability No.	Due Date
HP	34401A	S/N US360641	2-Jul-2020	,610119	2-Jul-2021
HP	34401A	S/N US361024	2-Jul-2020	,610119	2-Jul-2021
HP	33120A	S/N US360437	2-Jul-2020	,610119	2-Jul-2021
B&K	2133	S/N 1583254	1-Jul-2020	684.07/O-0000001126-20	1-Jul-2021

Cal. Date: 29-Mar-2021 — Tested by: James Zhu

Calibrated on WCCL system type 9700

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11. CONCLUSION

The measurements indicate that the referenced wireless communications device, when used with the accessory, complies with the HAC limits specified in accordance with the ANSI C63.19 Standard and FCC WT Docket No. 01-309 RM-8658. Precise laboratory measures were taken to assure repeatability of the tests. The tested device complies with the requirements in respect to all parameters specific to the test. The test results and statements relate only to the item(s) tested.

The measurement system and techniques presented in this evaluation are proposed in the ANSI standard as a means of best approximating wireless device compatibility with a hearing-aid. The literature is under continual re-construction.

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12. REFERENCES

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