Starkey Laboratories, Inc.

G Series AI BTE 13

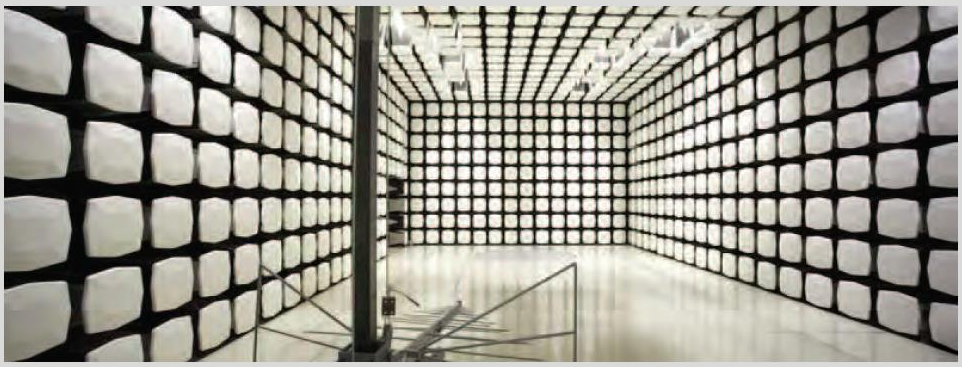
FCC 15.247:2025

RSS-247 Issue 3:2023

RSS-Gen Issue 5:2018+A1:2019+A2:2021

Bluetooth Radio

Report: STAK0373.0 Rev. 01, Issue Date: November 5, 2025



CERT #3310.05

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element
2023.04.17

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CERTIFICATE OF TEST

Last Date of Test: September 29, 2025
Starkey Laboratories, Inc.
EUT: G Series AI BTE 13

Radio Equipment Testing

Standards

Specification	Method
FCC 15.247:2025	ANSI C63.10:2020 + Cor.1 2023
RSS-247 Issue 3:2023	
RSS-Gen Issue 5:2018+A1:2019+A2:2021	

Guidance

FCC KDB 558074 v05r02:2019
Notice 2021 - CEB0001

Results

Test Description	Result	FCC Section(s)	RSS Section(s)	ANSI C63.10 Section(s)	Comments
Powerline Conducted Emissions	N/A	15.207	RSS-Gen 8.8	6.2	Not required for a battery powered EUT.
Duty Cycle	N/A	KDB 558074 -6.0	RSS-Gen 3.2	11.6	See data sheet.
DTS Bandwidth (6 dB)	Pass	15.247(a)(2), KDB 558074 -8.2	RSS-247 5.2(a)	11.8.2	
Occupied Bandwidth (99%)	N/A	KDB 558074 -2.1	RSS-Gen 6.7	6.9.3	See data sheet.
Output Power	Pass	15.247(b)(3), KDB 558074 -8.3.1	RSS-247 5.4(d, f), RSS-Gen 6.12	11.9.1.1	
Equivalent Isotropic Radiated Power	Pass	15.247(b)(3), KDB 558074 -8.3.1	RSS-247 5.4(d, f), RSS-Gen 6.12	11.9.1.1	
Power Spectral Density	Pass	15.247(e), KDB 558074 -8.4	RSS-247 5.2(b)	11.10.2	
Band Edge Compliance	Pass	15.247(d), KDB 558074 -8.5	RSS-247 5.5	11.11	
Spurious Conducted Emissions	Pass	15.247(d), KDB 558074 -8.5	RSS-247 5.5	11.11	
Radiated Band Edge Emissions	Pass	15.247(d), KDB 558074 - 8.6, 8.7	RSS-247 5.5, RSS-Gen 6.13, 8.10	11.12.1, 11.13.2, 6.6	
Spurious Radiated Emissions	Pass	15.247(d), KDB 558074 - 8.6, 8.7	RSS-247 5.5, RSS-Gen 6.13, 8.10	11.12.1, 11.13.2, 6.4, 6.5, 6.6	

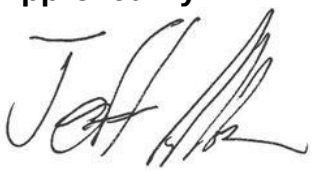
Product compliance is the responsibility of the client; therefore, the tests and equipment modes of operation represented in this report were agreed upon by the client, prior to testing. The results of this test pertain only to the sample(s) tested. The specific description is noted in each of the individual sections of the test report supporting this certificate of test. This report reflects only those tests from the referenced standards shown in the certificate of test. It does not include inspection or verification of labels, identification, marking or user information. As indicated in the Statement of Work sent with the quotation, Element's standard process is to always use the latest published version of the test methods even when earlier versions are cited in the test specification. Issuance of a purchase order was de facto acceptance of this approach. Otherwise, the client would have advised Element in writing of the specific version of the test methods they wanted applied to the subject testing.

CERTIFICATE OF TEST

Deviations From Test Standards

None

Approved By:



Jeff Alcoke, Senior EMC Test Engineer
Signed for and on behalf of Element

Product compliance is the responsibility of the client; therefore, the tests and equipment modes of operation represented in this report were agreed upon by the client, prior to testing. The results of this test pertain only to the sample(s) tested. The specific description is noted in each of the individual sections of the test report supporting this certificate of test. This report reflects only those tests from the referenced standards shown in the certificate of test. It does not include inspection or verification of labels, identification, marking or user information. As indicated in the Statement of Work sent with the quotation, Element's standard process is to always use the latest published version of the test methods even when earlier versions are cited in the test specification. Issuance of a purchase order was de facto acceptance of this approach. Otherwise, the client would have advised Element in writing of the specific version of the test methods they wanted applied to the subject testing.

REVISION HISTORY

Revision Number	Description	Date (yyyy-mm-dd)	Page Number
01	Added model equivalency statement.	2025-11-05	11
	Updated maximum frequency range to 26.5 GHz.	2025-11-05	15
	Added operational duty cycle.	2025-11-05	16, 50
	Updated calibration date to cable MNL.	2025-11-05	23, 28, 31, 34, 37, 40, 43, 46
	Updated screen captures in Radiated Band Edge.	2025-11-05	51

FACILITIES

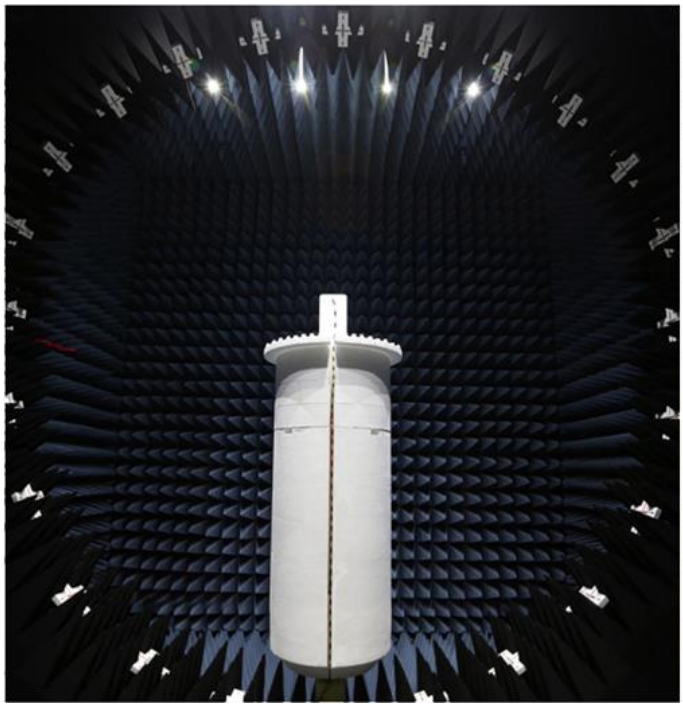
element
2025.07.17

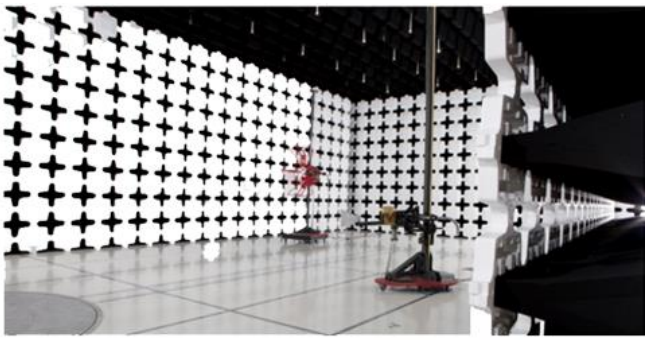
Testing was performed at the following location(s)

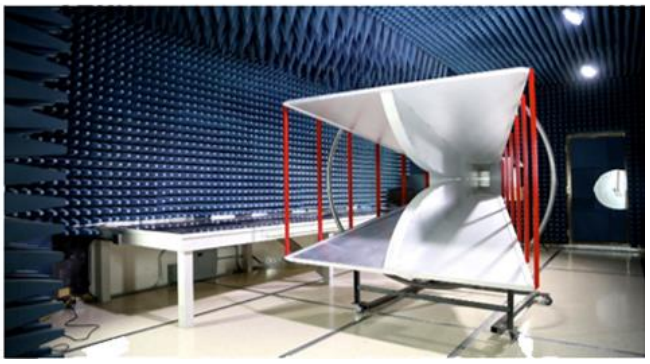
	Location	Labs (1)	Address	A2LA (2)	ISED (3)	BSMI (4)	VCCI (5)	CAB	FDA (6)
☐	California	OC01-17	41 Tesla Irvine, CA 92618 (949) 861-8918	3310.04	2834B	SL2-IN-E-1154R	A-0029	US0158	TL-55
☒	Minnesota	MN01-11	9349 W Broadway Ave. Brooklyn Park, MN 55445 (612) 638-5136	3310.05	2834E	SL2-IN-E-1152R	A-0109	US0175	TL-57
☐	Oregon	EV01-12	6775 NE Evergreen Pkwy #400 Hillsboro, OR 97124 (503) 844-4066	3310.02	2834D	SL2-IN-E-1017	A-0108	US0017	TL-56
☐	Washington	NC01-05	19201 120th Ave NE Bothell, WA 98011 (425) 984-6600	3310.06	2834F	SL2-IN-E-1153R	A-0110	US0157	TL-67
☐	Offsite	N/A	See Product Description	N/A	N/A	N/A	N/A	N/A	N/A

See data sheets for specific labs

(1) The lab designations denote individual rooms within each location. (OC01, OC02, OC03, etc.)
(2) A2LA Certificate No.
(3) ISED Company No.
(4) BSMI No.
(5) VCCI Site Filing No.
(6) FDA ASCA No.







MEASUREMENT UNCERTAINTY

element
MU 2025-03-26

Measurement Uncertainty

When a measurement is made, the result will be different from the true or theoretically correct value. The difference is the result of tolerances in the measurement system that cannot be completely eliminated. To the extent that technology allows us, it has been our aim to minimize this error. Measurement uncertainty is a statistical expression of measurement error qualified by a probability distribution.

A measurement uncertainty estimation reported is based on statistical analysis that was performed by the laboratory. The estimation is used to compare the measured result with its "true" or theoretically correct value. The expanded measurement uncertainty (k=2) can be found in the table below. A lab specific value may also be found in the applicable test description section. Our measurement data meets or exceeds the measurement uncertainty requirements of the applicable specification; therefore, the test data can be compared directly to the specification limit to determine compliance. The calculations for estimating measurement uncertainty are based upon ETSI TR 100 028 (or CISPR 16-4-2 as applicable) and are available upon request.

The following table represents the Measurement Uncertainty (MU) budgets for each of the tests that may be contained in this report.

Various Measurements

Test	All Labs (+/-)
Frequency Accuracy (%)	0.0007
Amplitude Accuracy (dB)	1.2
Conducted Power (dB)	1.2
Radiated Power via Substitution (dB)	0.7
Temperature (degrees C)	0.7
Humidity (% RH)	2.5
Voltage (AC) (%)	1
Voltage (DC) (%)	0.7
Near-field Measurement of E-Field (dB)	1.89
Near-field Measurement of H-Field (dB)	2.65

Field Strength Measurements (dB)

Range	MN09 (+/-)	MN11 (+/-)
30MHz-1GHz 3m	4.6	N/A
1GHz-6GHz	5.1	N/A
6GHz-40GHz	5.3	N/A

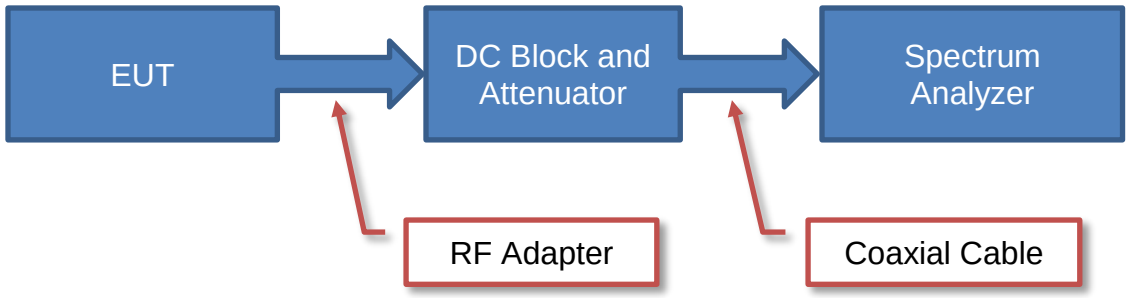
TEST SETUP BLOCK DIAGRAMS

Measurement Bandwidths

Frequency Range (MHz)	Peak Data (kHz)	Quasi-Peak Data (kHz)	Average Data (kHz)
0.01 - 0.15	1.0	0.2	0.2
0.15 - 30.0	10.0	9.0	9.0
30.0 - 1000	100.0	120.0	120.0
Above 1000	1000.0	N/A	1000.0

Unless otherwise stated, measurements were made using the bandwidths and detectors specified. No video filter was used.

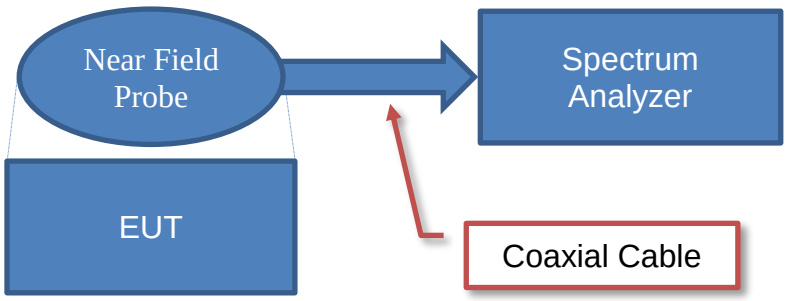
Antenna Port Conducted Measurements



Sample Calculation (logarithmic units)

Measured Value		Measured Level		Reference Level Offset
71.2	=	42.6	+	28.6

Near Field Test Fixture Measurements

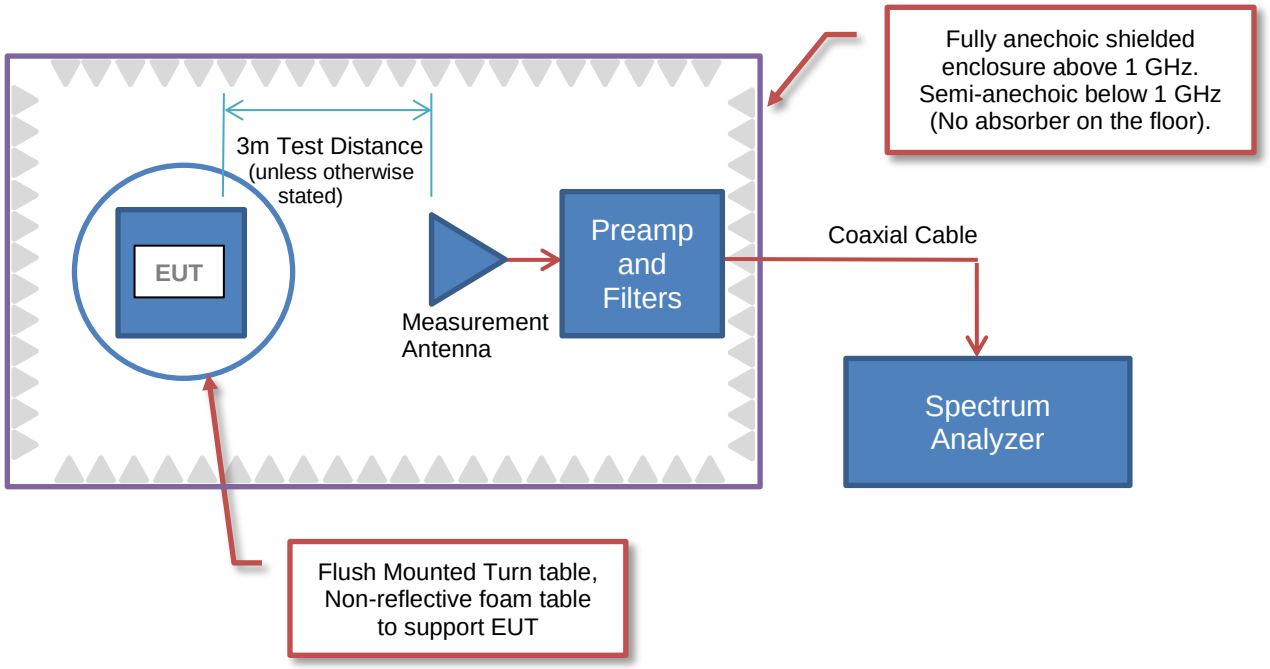


Sample Calculation (logarithmic units)

Measured Value		Measured Level		Reference Level Offset
71.2	=	42.6	+	28.6

TEST SETUP BLOCK DIAGRAMS

Emissions Measurements



Sample Calculation (logarithmic units)

Radiated Emissions:

Measured Level (Amplitude)		Factor: Antenna Factor		Factor: Cable Factor		Factor: Amplifier Gain		Distance Adjustment Factor		External Attenuation		Field Strength
42.6	+	28.6	+	3.1	-	40.8	+	0.0	+	0.0	=	**33.5**

Conducted Emissions:

Measured Level (Amplitude)		Factor: Transducer Factor		Factor: Cable Factor		External Attenuation		Adjusted Level
26.7	+	0.3	+	0.1	+	20.0	=	**47.1**

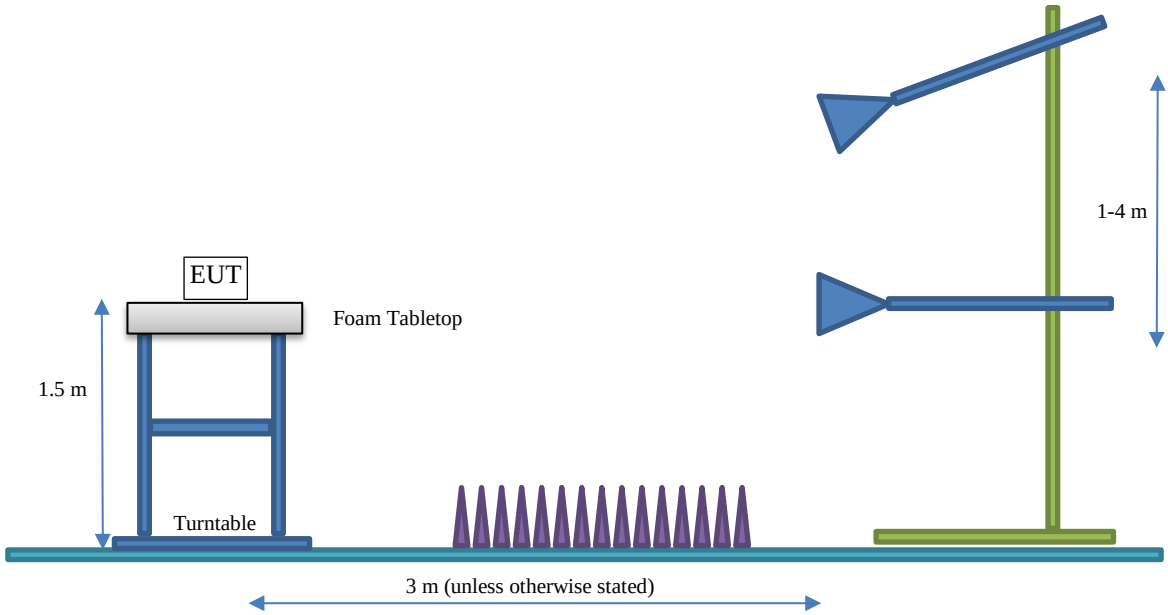
Radiated Power (ERP/EIRP) – Substitution Method:

Measured Level into Substitution Antenna (Amplitude dBm)		Substitution Antenna Factor (dBi)		EIRP to ERP (if applicable)		Measured power (dBm ERP/EIRP)
10.0	+	6.0	-	2.15	=	**13.9/16.0**

TEST SETUP BLOCK DIAGRAMS

Bore Sighting (>1GHz)

The diameter of the illumination area is the dimension of the line tangent to the EUT formed by 3 dB beamwidth of the measurement antenna at the measurement distance. At a 3 meter test distance, the diameter of the illumination area was 3.8 meters at 1 GHz and greater than 2.1 meters up to 6 GHz. Above 1 GHz, when required by the measurement standard, the antenna is pointed for both azimuth and elevation to maintain the receive antenna within the cone of radiation from the EUT. The specified measurement detectors were used for comparison of the emissions to the peak and average specification limits.



PRODUCT DESCRIPTION

Client and Equipment under Test (EUT) Information

Company Name:	Starkey Laboratories, Inc.
Address:	6600 Washington Ave S
City, State, Zip:	Eden Prairie, MN 55344-3404
Test Requested By:	Bill Mitchell
EUT:	G Series AI BTE 13
First Date of Test:	August 22, 2025
Last Date of Test:	September 29, 2025
Receipt Date of Samples:	August 22, 2025
Equipment Design Stage:	Production
Equipment Condition:	No Damage
Purchase Authorization:	Verified

Information Provided by the Party Requesting the Test

Functional Description of the EUT:
Hearing aid with BLE radio

Model Equivalency Statement:
Testing covers the following models: G SERIES AI P BTE 13, A SERIES AI P BTE 13, NE SERIES AI P BTE 13. OuieZen GS BTE 13 P, G SERIES AI UP BTE 13, A SERIES AI UP BTE 13, NE SERIES AI UP BTE 13, OuieZen GS BTE 13 UP.

Testing Objective:
To demonstrate compliance of the Bluetooth radio to FCC 15.247/RSS-247 requirements.

POWER SETTINGS AND ANTENNAS

The power settings, antenna gain value(s) and cable loss (if applicable) used for the testing contained in this report were provided by the customer and will affect the validity of the results. Element assumes no responsibility for the accuracy of this information. The power settings below reflect the maximum power that the EUT is allowed to transmit at during normal operation.

ANTENNA GAIN (dBi)

Type	Provided by:	Frequency Range (MHz)	Gain (dBi)
Folded Bowtie	Starkey Laboratories, inc.	2400-2485	-6 dBi

The EUT was tested using the power settings provided by the manufacturer which were based upon:

☒ Test software settings
☐ Rated power settings

SETTINGS FOR ALL TESTS IN THIS REPORT

Modulation Types	Channel	Channel & Frequency	Power setting
BLE GFSK 1 Mbps, 2 Mbps	37	Low Channel (2402 MHz)	2
	18	Mid Channel (2442 MHz)	2
	39	High Channel (2480 MHz)	2

CONFIGURATIONS

Configuration STAK0373-1

Software/Firmware Running During Test	
Description	**Version**
Firmware	8.5.0.5.0
Instrument Controller	2.3.3

EUT			
Description	**Manufacturer**	**Model/Part Number**	**Serial Number**
G Series AI BTE 13	Starkey Laboratories, Inc.	G Series AI BTE 13	251468235

Configuration STAK0373-2

Software/Firmware Running During Test	
Description	**Version**
Firmware	8.5.0.5.0
Instrument Controller	2.3.3

EUT			
Description	**Manufacturer**	**Model/Part Number**	**Serial Number**
G Series AI BTE 13	Starkey Laboratories, Inc.	G Series AI BTE 13	251468236

Remote Equipment Outside of Test Setup Boundary			
Description	**Manufacturer**	**Model/Part Number**	**Serial Number**
Laptop	Dell	Lattitude 5420	JM 323D3
Noahlink BLE Adapter	Noahlink	None	2181182911

Cables					
Cable Type	**Shield**	**Length (m)**	**Ferrite**	**Connection 1**	**Connection 2**
USB Cable	Yes	0.8 m	No	Laptop	Noahlink BLE Adapter

MODIFICATIONS

Equipment Modifications

Item	Date	Test	Modification	Note	Disposition of EUT
1	2025-08-22	Spurious Radiated Emissions	Tested as delivered to test Station.	No EMI suppression devices were added or modified during this test.	EUT remained at Element following the test.
2	2025-09-02	Band Edge Compliance	Tested as delivered to test Station.	No EMI suppression devices were added or modified during this test.	EUT remained at Element following the test.
3	2025-09-02	DTS Bandwidth (6 dB)	Tested as delivered to test Station.	No EMI suppression devices were added or modified during this test.	EUT remained at Element following the test.
4	2025-09-02	Duty Cycle	Tested as delivered to test Station.	No EMI suppression devices were added or modified during this test.	EUT remained at Element following the test.
5	2025-09-02	Equivalent Isotropic Radiated Power	Tested as delivered to test Station.	No EMI suppression devices were added or modified during this test.	EUT remained at Element following the test.
6	2025-09-02	Occupied Bandwidth (99%)	Tested as delivered to test Station.	No EMI suppression devices were added or modified during this test.	EUT remained at Element following the test.
7	2025-09-02	Output Power	Tested as delivered to test Station.	No EMI suppression devices were added or modified during this test.	EUT remained at Element following the test.
8	2025-09-02	Power Spectral Density	Tested as delivered to test Station.	No EMI suppression devices were added or modified during this test.	EUT remained at Element following the test.
9	2025-09-04	Spurious Conducted Emissions	Tested as delivered to test Station.	No EMI suppression devices were added or modified during this test.	EUT remained at Element following the test.
10	2025-09-29	Radiated Band Edge Emissions	Tested as delivered to test Station.	No EMI suppression devices were added or modified during this test.	Scheduled testing was completed.

SPURIOUS RADIATED EMISSIONS

element
WTD.2025.03.25.0
EmiR5 2025.04.30.2
PSA-ESCI 2024.11.22.0

TEST DESCRIPTION

The highest gain antenna of each type to be used with the EUT was tested. The EUT was configured for the required transmit frequencies and the modes as shown in the data sheets.

For each configuration, the spectrum was scanned throughout the specified range as part of the exploratory investigation of the emissions. A reference preview scan (pre-scan) is included in the report. Final measurements on individual emissions were then made and included in this test report.

The individual emissions from the EUT were maximized by rotating the EUT on a turntable, adjusting the position of the EUT and EUT antenna in three orthogonal axes if required, and adjusting the measurement antenna height and polarization (per ANSI C63.10). A preamp and high pass filter (and notch filter) were used for this test to provide sufficient measurement sensitivity.

Measurements were made with the required detectors and annotated on the data for each individual point using the following annotation:

QP = Quasi-Peak Detector
PK = Peak Detector
AV = RMS Detector

Measurements were made to satisfy the specific requirements of the test specification for out-of-band emissions as well as the restricted band requirements. If there are no detectable emissions above the noise floor, the data included may show noise floor measurements for reference only.

TEST EQUIPMENT

Description	Manufacturer	Model	ID	Last Cal.	Cal. Due
Amplifier - Pre-Amplifier	Miteq	AMF-3D-00100800-32-13P	AVX	2025-02-01	2026-02-01
Amplifier - Pre-Amplifier	Miteq	AMF-6F-08001200-30-10P	AVC	2025-02-01	2026-02-01
Amplifier - Pre-Amplifier	L-3 Narda-Miteq	AMF-6F-12001800-30-10P	PAP	2025-02-01	2026-02-01
Amplifier - Pre-Amplifier	Miteq	AM-1064-9079 and SA18E-10	AOO	2025-01-30	2026-01-30
Amplifier - Pre-Amplifier	Miteq	JSD4-18002600-26-8P	APU	2024-09-05	2025-09-05
Antenna - Biconilog	Teseq	CBL 6141B	AYD	2024-03-18	2026-03-18
Antenna - Double Ridge	ETS Lindgren	3115	AJA	2023-09-06	2025-09-06
Antenna - Loop	ETS Lindgren	6502	AOB	2025-06-17	2027-06-17
Antenna - Standard Gain	ETS-Lindgren	3160-07	AJJ	2025-02-04	2026-02-04
Antenna - Standard Gain	ETS-Lindgren	3160-08	AJP	2025-02-04	2026-02-04
Antenna - Standard Gain	ETS Lindgren	3160-09	AHG	2025-02-04	2026-02-04
Attenuator	Coaxicom	3910-20	AXY	2024-09-10	2025-09-10
Cable	Element	Double Ridge Guide Horn Cables	MNV	2024-09-10	2025-09-10
Cable	Element	Standard Gain Cable	MNW	2024-09-10	2025-09-10
Cable	ESM Cable Corp.	TTBJ141 KMKM-72	MNP	2024-09-05	2025-09-05
Cable	ESM Cable Corp.	Antenna Loop Cable	MNE	2025-02-01	2026-02-01
Filter - High Pass	Micro-Tronics	HPM50111	HFM	2024-09-10	2025-09-10
Filter - Low Pass	Micro-Tronics	LPM50004	HGG	2024-09-10	2025-09-10
Receiver	Rohde & Schwarz	ESR26	ARP	2025-06-24	2026-06-24

FREQUENCY RANGE INVESTIGATED

9 kHz TO 26.5 GHz

POWER INVESTIGATED

1.5VDC Battery Powered

CONFIGURATIONS INVESTIGATED

STAK0373-1

MODES INVESTIGATED

BLE Radio Transmitting Low (2402 MHz), Mid (2442 MHz) & High (2480 MHz)

SPURIOUS RADIATED EMISSIONS

element
WTD.2025.03.25.0
EmiR5 2025.04.30.2
PSA-ESCI 2024.11.22.0

EUT:	G Series AI BTE 13	Work Order:	STAK0373
Serial Number:	251468235	Date:	2025-08-22
Customer:	Starkey Laboratories, Inc.	Temperature:	22.1°C
Attendees:	John Quach	Relative Humidity:	57.4%
Customer Project:	None	Bar. Pressure (PMSL):	1015 mb
Tested By:	Arnauld Dedry	Job Site:	MN09
Power:	1.5VDC Battery Powered	Configuration:	STAK0373-1

TEST PARAMETERS

Run #:	19	Test Distance (m):	3	Ant. Height(s) (m):	1 to 4(m)

COMMENTS

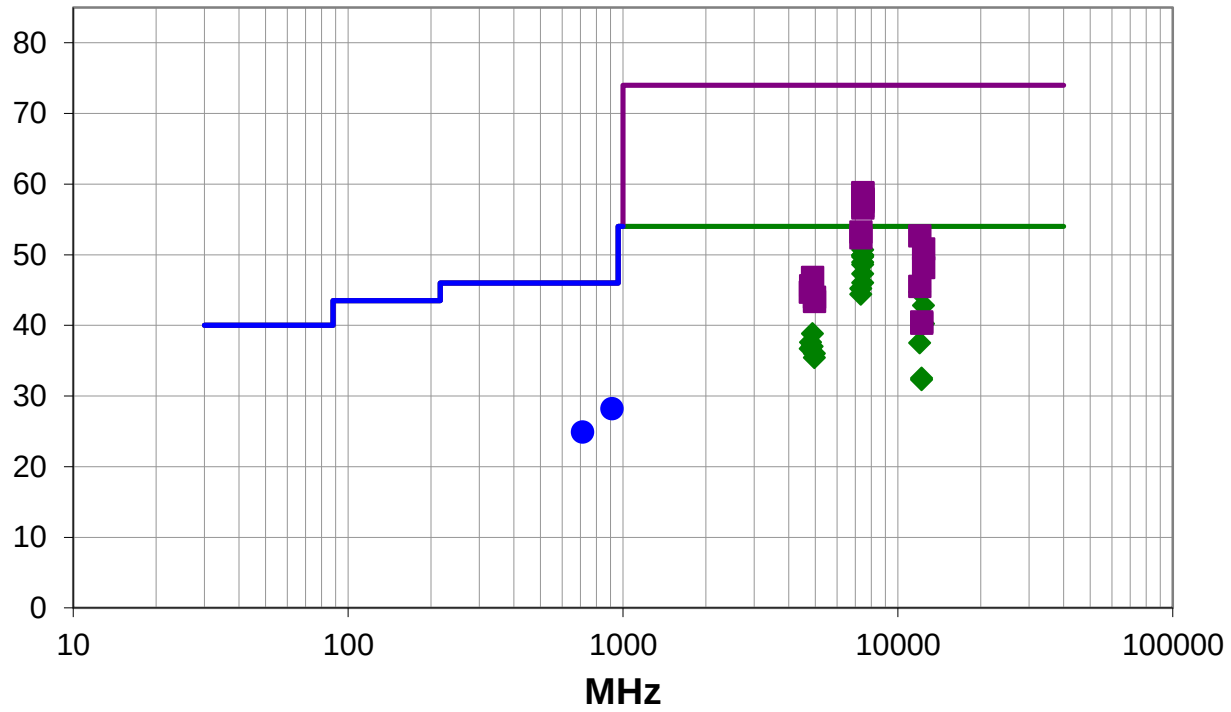
As per FCC KDB 558074 (QA 3 a). The average measurements were determined by subtracting the operational duty cycle (as given by the client) from the peak measurements. The downward correction applied to the peak measurements was determined by using 10*log(operational duty cycle).
Operational duty cycle for 1 Mbps is 16% and 7% for 2 Mbps
DCCF 1 Mbps = 10*log(0.16) = -8 dB
DCCF 2 Mbps = 10*log(0.07) = -11.5 dB

EUT OPERATING MODES

BLE Radio Transmitting Low (2402 MHz), Mid (2442 MHz) & High (2480 MHz)

DEVIATIONS FROM TEST STANDARD

None



Run #: 19 PK AV QP

SPURIOUS RADIATED EMISSIONS

element
WTD.2025.03.25.0
EmiR5 2025.04.30.2
PSA-ESCI 2024.11.22.0

RESULTS - Run #19

Freq (MHz)	Amplitude (dBuV)	Factor (dB/m)	Antenna Height (meters)	Azimuth (degrees)	Duty Cycle Correction Factor (dB)	External Attenuation (dB)	Polarity/ Transducer Type	Detector	Distance Adjustment (dB)	Adjusted (dBuV/m)	Spec. Limit (dBuV/m)	Compared to Spec. (dB)	Comments
7439.142	44.6	14.1	1.5	30.0	-8.0	0.0	Horz	AV	0.0	50.7	54.0	-3.3	Eut Horz, High Ch, 1 Mbps
7440.292	43.8	14.1	2.1	247.0	-8.0	0.0	Horz	AV	0.0	49.9	54.0	-4.1	Eut Vert, High Ch, 1 Mbps
7440.700	43.8	14.1	3.5	156.0	-8.0	0.0	Vert	AV	0.0	49.9	54.0	-4.1	Eut Vert, High Ch, 1 Mbps
7440.608	43.6	14.1	1.4	148.0	-8.0	0.0	Vert	AV	0.0	49.7	54.0	-4.3	Eut On Side, High Ch, 1 Mbps
7439.100	42.8	14.1	3.4	50.0	-8.0	0.0	Horz	AV	0.0	48.9	54.0	-5.1	Eut On Side, High Ch, 1 Mbps
7441.083	42.5	14.1	1.0	262.0	-8.0	0.0	Vert	AV	0.0	48.6	54.0	-5.4	Eut Horz, High Ch, 1 Mbps
7441.267	44.7	14.1	1.5	199.0	-11.5	0.0	Horz	AV	0.0	47.3	54.0	-6.7	Eut Horz, High Ch, 2 Mbps
7438.600	43.4	14.1	1.5	172.0	-11.5	0.0	Vert	AV	0.0	46.0	54.0	-8.0	Eut Vert, High Ch, 2 Mbps
7327.708	39.9	13.3	1.6	190.0	-8.0	0.0	Horz	AV	0.0	45.2	54.0	-8.8	Eut Horz, Mid Ch, 1 Mbps
12010.080	54.3	-1.6	1.1	229.0	-8.0	0.0	Horz	AV	0.0	44.7	54.0	-9.3	Eut Horz, Low Ch, 1 Mbps
7327.067	39.2	13.2	1.5	110.0	-8.0	0.0	Vert	AV	0.0	44.4	54.0	-9.6	Eut Vert, Mid Ch, 1 Mbps
12399.780	50.9	-0.1	1.1	360.0	-8.0	0.0	Horz	AV	0.0	42.8	54.0	-11.2	Eut Horz, High Ch, 1 Mbps
12399.700	48.3	-0.1	1.2	97.0	-8.0	0.0	Vert	AV	0.0	40.2	54.0	-13.8	Eut Vert, High Ch, 1 Mbps
4884.775	42.0	4.8	1.3	319.0	-8.0	0.0	Horz	AV	0.0	38.8	54.0	-15.2	Eut Horz, Mid Ch, 1 Mbps
7441.267	44.7	14.1	1.5	199.0	0.0	0.0	Horz	PK	0.0	58.8	74.0	-15.2	Eut Horz, High Ch, 2 Mbps
7439.142	44.6	14.1	1.5	30.0	0.0	0.0	Horz	PK	0.0	58.7	74.0	-15.3	Eut Horz, High Ch, 1 Mbps
7440.292	43.8	14.1	2.1	247.0	0.0	0.0	Horz	PK	0.0	57.9	74.0	-16.1	Eut Vert, High Ch, 1 Mbps
7440.700	43.8	14.1	3.5	156.0	0.0	0.0	Vert	PK	0.0	57.9	74.0	-16.1	Eut Vert, High Ch, 1 Mbps
7440.608	43.6	14.1	1.4	148.0	0.0	0.0	Vert	PK	0.0	57.7	74.0	-16.3	Eut On Side, High Ch, 1 Mbps
4805.067	40.6	5.0	1.3	34.0	-8.0	0.0	Horz	AV	0.0	37.6	54.0	-16.4	Eut Horz, Low Ch, 1 Mbps
7438.600	43.4	14.1	1.5	172.0	0.0	0.0	Vert	PK	0.0	57.5	74.0	-16.5	Eut Vert, High Ch, 2 Mbps
12009.930	47.1	-1.6	3.0	206.0	-8.0	0.0	Vert	AV	0.0	37.5	54.0	-16.5	Eut Vert, Low Ch, 1 Mbps
4882.058	40.2	4.8	1.5	332.0	-8.0	0.0	Vert	AV	0.0	37.0	54.0	-17.0	Eut Vert, Mid Ch, 1 Mbps
7439.100	42.8	14.1	3.4	50.0	0.0	0.0	Horz	PK	0.0	56.9	74.0	-17.1	Eut On Side, High Ch, 1 Mbps
4802.700	39.6	5.1	1.6	74.0	-8.0	0.0	Vert	AV	0.0	36.7	54.0	-17.3	Eut Vert, Low Ch, 1 Mbps
7441.083	42.5	14.1	1.0	262.0	0.0	0.0	Vert	PK	0.0	56.6	74.0	-17.4	Eut Horz, High Ch, 1 Mbps
911.744	16.4	11.8	1.0	122.0	0.0	0.0	Vert	QP	0.0	28.2	46.0	-17.8	Eut Vert, High Ch, 1 Mbps
4962.142	39.4	4.6	3.5	326.0	-8.0	0.0	Vert	AV	0.0	36.0	54.0	-18.0	Eut Vert, High Ch, 1 Mbps
4962.200	38.8	4.6	1.5	116.0	-8.0	0.0	Horz	AV	0.0	35.4	54.0	-18.6	Eut Horz, High Ch, 1 Mbps
7327.708	39.9	13.3	1.6	190.0	0.0	0.0	Horz	PK	0.0	53.2	74.0	-20.8	Eut Horz, Mid Ch, 1 Mbps
712.420	16.4	8.5	1.5	39.0	0.0	0.0	Horz	QP	0.0	24.9	46.0	-21.1	Eut Horz, High Ch, 1 Mbps
12010.080	54.3	-1.6	1.1	229.0	0.0	0.0	Horz	PK	0.0	52.7	74.0	-21.3	Eut Horz, Low Ch, 1 Mbps
12209.830	41.3	-0.8	1.5	195.0	-8.0	0.0	Vert	AV	0.0	32.5	54.0	-21.5	Eut Vert, Mid Ch, 1 Mbps
7327.067	39.2	13.2	1.5	110.0	0.0	0.0	Vert	PK	0.0	52.4	74.0	-21.6	Eut Vert, Mid Ch, 1 Mbps
12209.510	41.1	-0.8	1.5	176.0	-8.0	0.0	Horz	AV	0.0	32.3	54.0	-21.7	Eut Horz, Mid Ch, 1 Mbps
12399.780	50.9	-0.1	1.1	360.0	0.0	0.0	Horz	PK	0.0	50.8	74.0	-23.2	Eut Horz, High Ch, 1 Mbps
12399.700	48.3	-0.1	1.2	97.0	0.0	0.0	Vert	PK	0.0	48.2	74.0	-25.8	Eut Vert, High Ch, 1 Mbps
4884.775	42.0	4.8	1.3	319.0	0.0	0.0	Horz	PK	0.0	46.8	74.0	-27.2	Eut Horz, Mid Ch, 1 Mbps
4805.067	40.6	5.0	1.3	34.0	0.0	0.0	Horz	PK	0.0	45.6	74.0	-28.4	Eut Horz, Low Ch, 1 Mbps
12009.930	47.1	-1.6	3.0	206.0	0.0	0.0	Vert	PK	0.0	45.5	74.0	-28.5	Eut Vert, Low Ch, 1 Mbps

SPURIOUS RADIATED EMISSIONS

element
WTD.2025.03.25.0
EmiR5 2025.04.30.2
PSA-ESCI 2024.11.22.0

Freq (MHz)	Amplitude (dBuV)	Factor (dB/m)	Antenna Height (meters)	Azimuth (degrees)	Duty Cycle Correction Factor (dB)	External Attenuation (dB)	Polarity/ Transducer Type	Detector	Distance Adjustment (dB)	Adjusted (dBuV/m)	Spec. Limit (dBuV/m)	Compared to Spec. (dB)	Comments
4882.058	40.2	4.8	1.5	332.0	0.0	0.0	Vert	PK	0.0	45.0	74.0	-29.0	Eut Vert, Mid Ch, 1 Mbps
4802.700	39.6	5.1	1.6	74.0	0.0	0.0	Vert	PK	0.0	44.7	74.0	-29.3	Eut Vert, Low Ch, 1 Mbps
4962.142	39.4	4.6	3.5	326.0	0.0	0.0	Vert	PK	0.0	44.0	74.0	-30.0	Eut Vert, High Ch, 1 Mbps
4962.200	38.8	4.6	1.5	116.0	0.0	0.0	Horz	PK	0.0	43.4	74.0	-30.6	Eut Horz, High Ch, 1 Mbps
12209.830	41.3	-0.8	1.5	195.0	0.0	0.0	Vert	PK	0.0	40.5	74.0	-33.5	Eut Vert, Mid Ch, 1 Mbps
12209.510	41.1	-0.8	1.5	176.0	0.0	0.0	Horz	PK	0.0	40.3	74.0	-33.7	Eut Horz, Mid Ch, 1 Mbps

CONCLUSION

Pass

Tested By

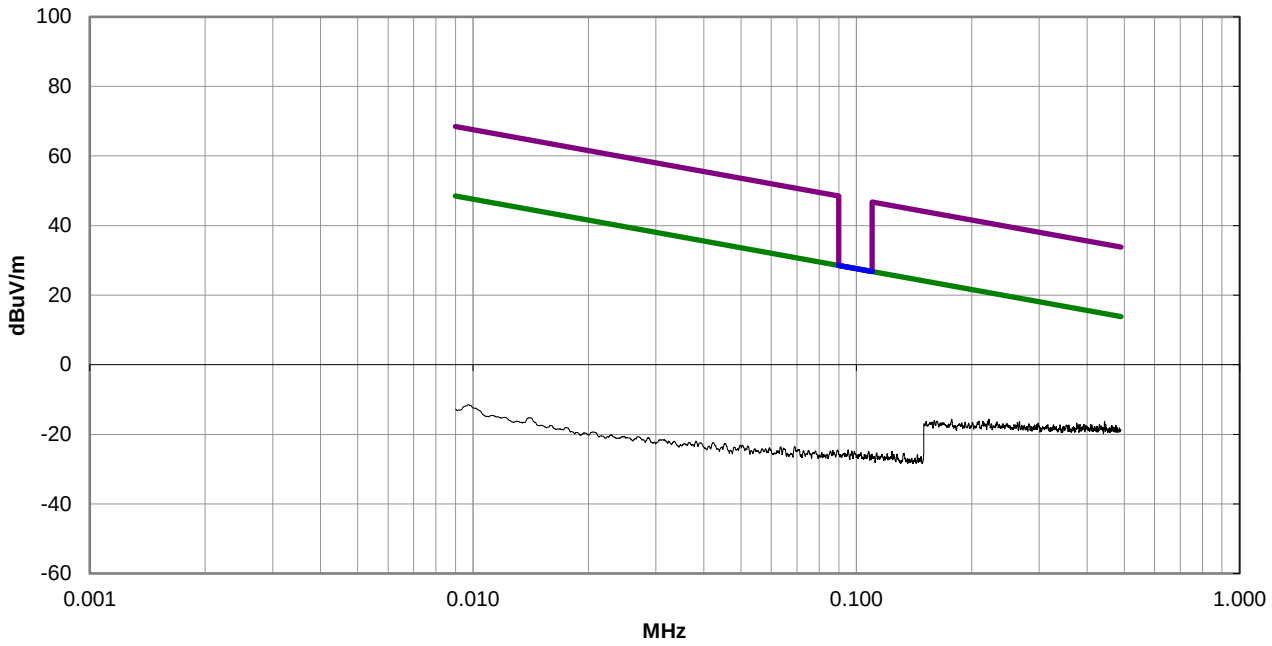
SPURIOUS RADIATED EMISSIONS

element
WTD.2025.03.25.0
EmiR5 2025.04.30.2
PSA-ESCI 2024.11.22.0

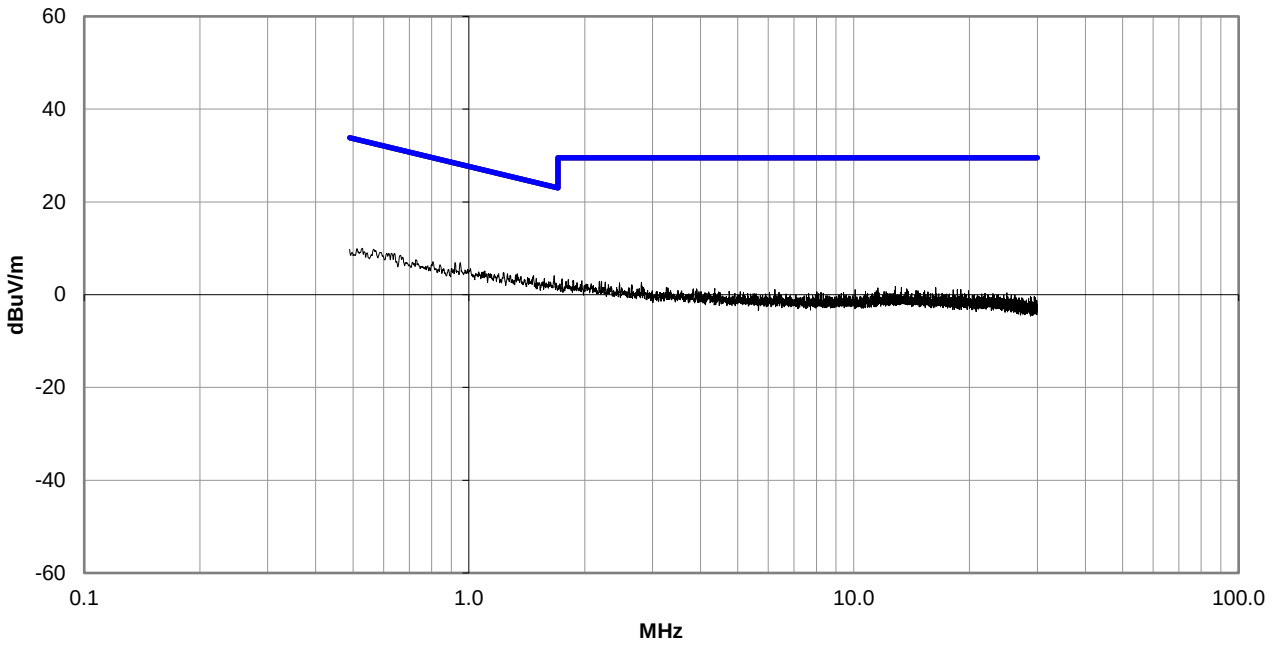
PRESCAN DATA

Radiated spurious emissions from the EUT are initially reviewed with Pre-scans (Preview scans). Pre-scans are performed, with the EUT transmitting on the lowest applicable data rate, for both vertical and horizontal polarizations. The Pre-scan plots below are shown with a peak detector and RBW for the following frequency ranges: 9 kHz RBW (< 30 MHz); 120 kHz RBW (30 - 1000 MHz); 1 MHz RBW (> 1 GHz). In the case where unintentional emissions are observed, an ambient or idle pre-scan with the radio off, will be shown for comparison.

0.009-0.49 MHz, Run 5



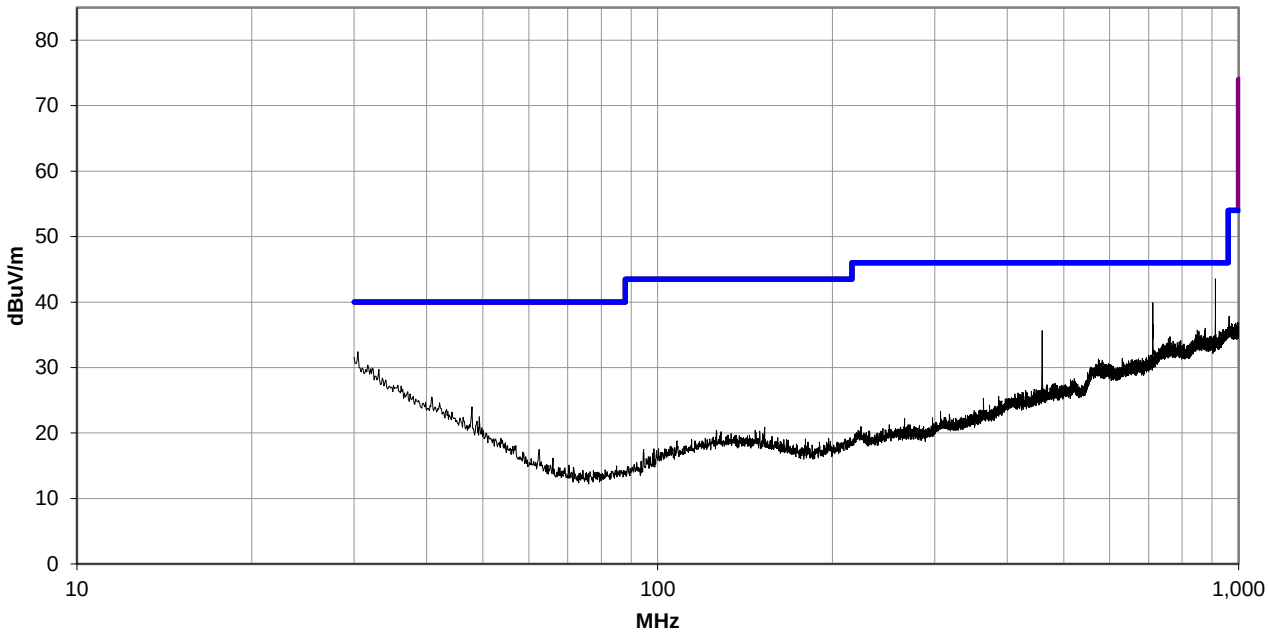
0.49-30 MHz, Run 10



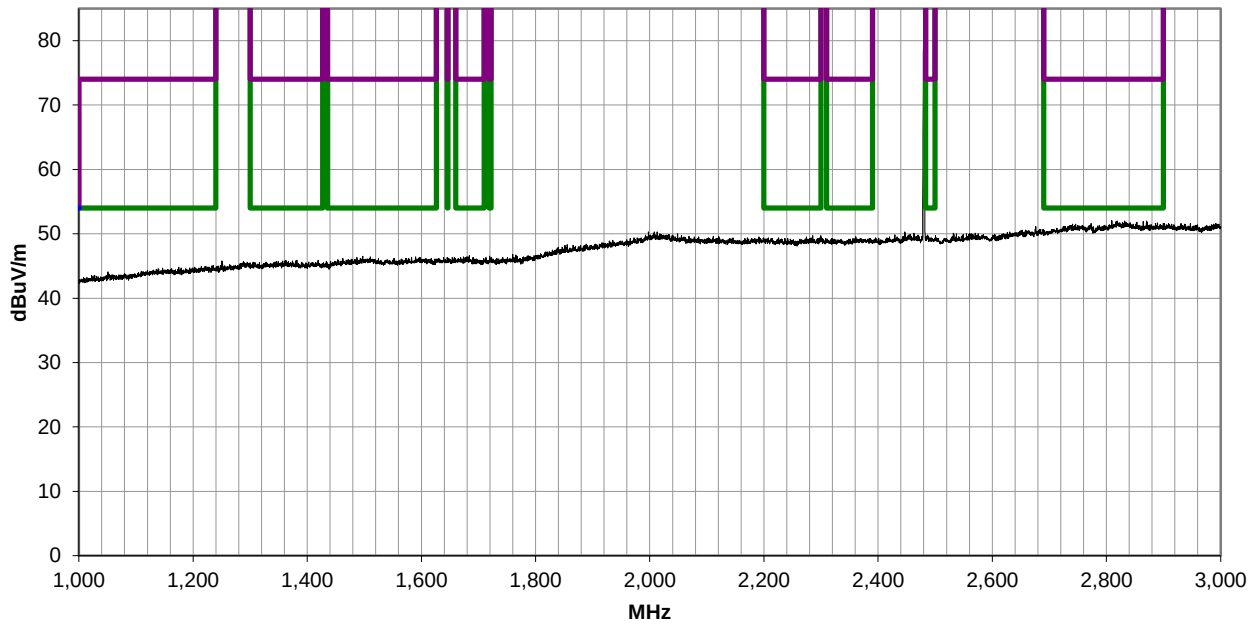
SPURIOUS RADIATED EMISSIONS

element
WTD.2025.03.25.0
EmiR5 2025.04.30.2
PSA-ESCI 2024.11.22.0

30-1000 MHz, Run 28



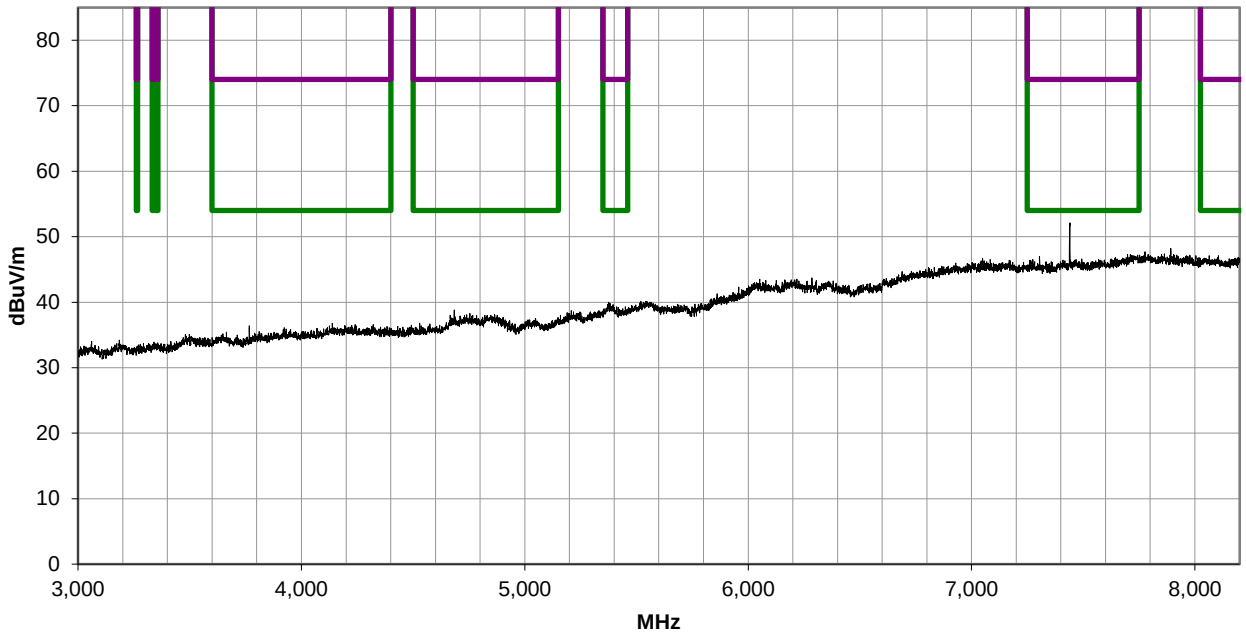
1000-3000 MHz, Run 16



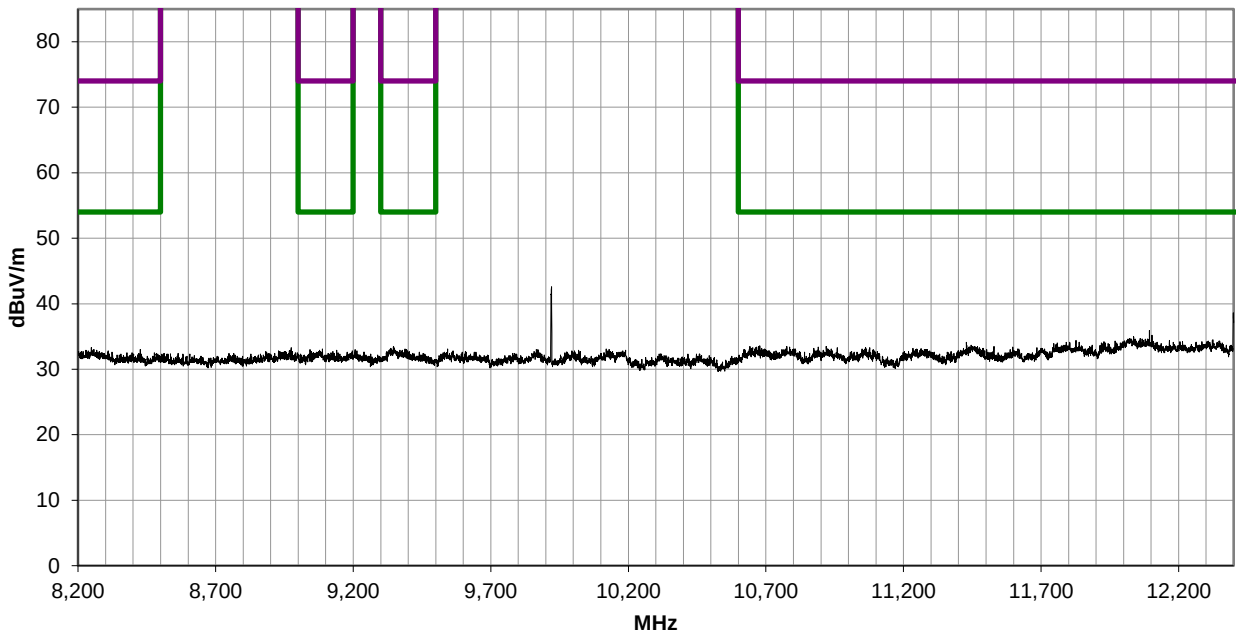
SPURIOUS RADIATED EMISSIONS

element
WTD.2025.03.25.0
EmiR5 2025.04.30.2
PSA-ESCI 2024.11.22.0

3000-8200 MHz, Run 17



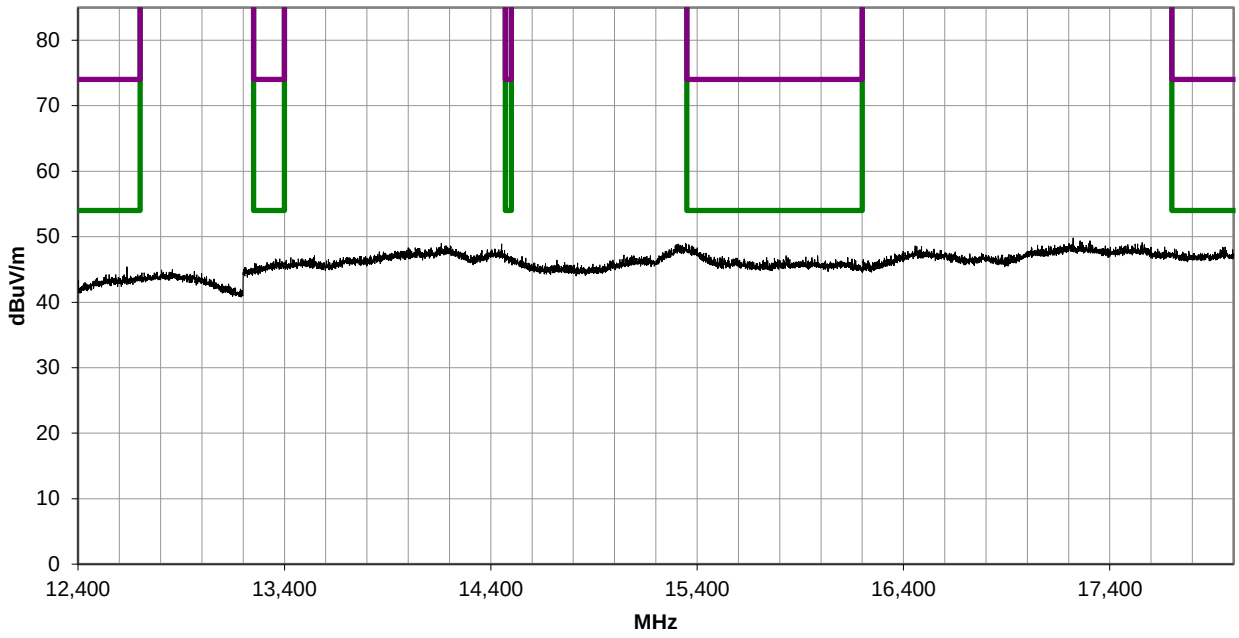
8200-12400 MHz, Run 18



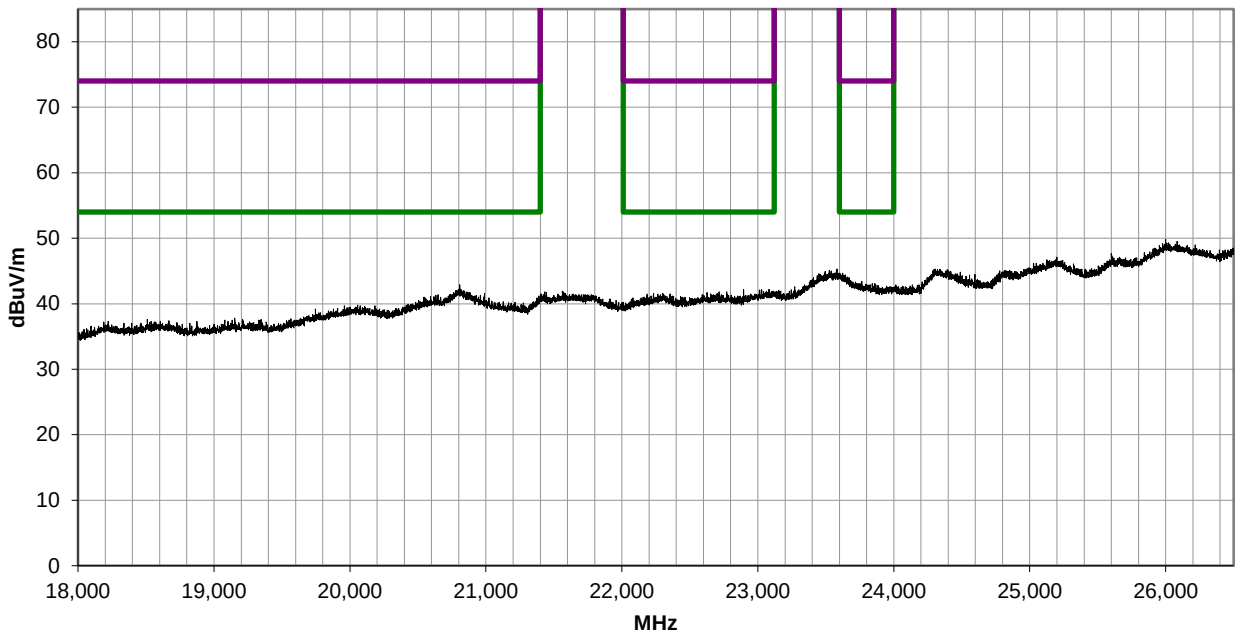
SPURIOUS RADIATED EMISSIONS

element
WTD.2025.03.25.0
EmiR5 2025.04.30.2
PSA-ESCI 2024.11.22.0

12400-18000 MHz, Run 19



18000-26500 MHz, Run 30



SPURIOUS CONDUCTED EMISSIONS

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

TEST DESCRIPTION

Testing was performed using the mode(s) of operation and configuration(s) noted within the report. The individuals and/or the organization requesting the test provided the modes, configurations and settings used to complete the evaluation. The actual test parameters are specified in the test data, this includes items such as investigated frequency range (scanned) and test levels. The testing methods and performance specifications, as well as the test site used for the evaluation are indicated in the test data.

The measurement was made using a direct connection between the RF output of the EUT and a spectrum analyzer.

The spurious RF conducted emissions were measured with the EUT set to low, medium and high transmit frequencies. The EUT was transmitting at the data rate(s) listed in the datasheet. For each transmit frequency, the fundamental was measured with a 100 kHz resolution bandwidth and the highest value was recorded. The rest of the spectrum was then measured with a 100 kHz resolution bandwidth and the highest value was found. The difference between the value found on the fundamental and the rest of the spectrum was compared against the limit to determine compliance.

The reference level offset for the fundamental screen capture was based on a measured value of the loss between the spectrum analyzer and the EUT which was verified at the time of test. The remaining screen capture(s) use an internal transducer factor on the analyzer to correct the displayed trace based on the cable loss over frequency. The reference level offset for the additional screen capture(s) is then based on the expected attenuator value and any other losses.

Fundamental Offset = Ref Lvl Offset showing measured composite factor of all losses

Remaining Screen capture(s) Offset = “Internal” cable loss factor not shown on screen capture + Ref Lvl Offset showing expected attenuator value and any other losses

TEST EQUIPMENT

Description	Manufacturer	Model	ID	Last Cal.	Cal. Due
Generator - Signal	Keysight	N5182B	TFX	2023-05-14	2026-05-14
Analyzer - Spectrum Analyzer	Keysight	N9010A	AFM	2025-06-09	2026-06-09
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2024-09-03	2025-09-03
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2025-09-03	2026-09-03
Block - DC	Fairview Microwave	SD3379	ANK	2025-06-03	2026-06-03
Attenuator	S.M. Electronics	SA26B-20	RFW	2025-02-03	2026-02-03
Power Supply - DC	Agilent	U8002A	TPZ	NCR	NCR

SPURIOUS CONDUCTED EMISSIONS

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

EUT:	G Series AI BTE 13	Work Order:	STAK0373
Serial Number:	251468236	Date:	2025-09-04
Customer:	Starkey Laboratories, Inc.	Temperature:	22.9°C
Attendees:	John Quach	Relative Humidity:	41%
Customer Project:	None	Bar. Pressure (PMSL):	1008 mbar
Tested By:	Christopher Heintzelman	Job Site:	MN11
Power:	1.5VDC via Power Supply	Configuration:	STAK0373-2

COMMENTS

The measurement is offset by the combined loss of the measurement cable, 20db attenuator, and DC block in the measurement path.

DEVIATIONS FROM TEST STANDARD

None

CONCLUSION

Pass

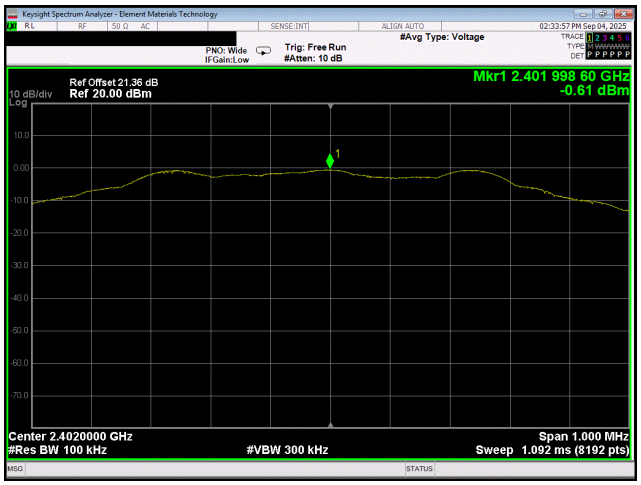
Tested By

TEST RESULTS

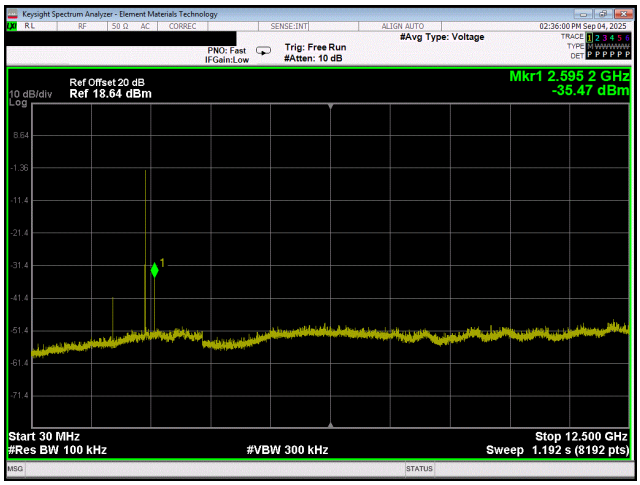
	Frequency Range	Measured Freq (MHz)	Max Value (dBc)	Limit ≤ (dBc)	Result
BLE/GFSK 1 Mbps					
Low Channel, 2402 MHz	Fundamental	2402	N/A	N/A	N/A
	30 MHz - 12.5 GHz	2595.25	-34.86	-20	Pass
	12.5 GHz - 25 GHz	24714.63	-35.98	-20	Pass
Mid Channel, 2442 MHz	Fundamental	2442	N/A	N/A	N/A
	30 MHz - 12.5 GHz	1859.93	-46.19	-20	Pass
	12.5 GHz - 25 GHz	24803.14	-34.45	-20	Pass
High Channel, 2480 MHz	Fundamental	2480	N/A	N/A	N/A
	30 MHz - 12.5 GHz	785.11	-42.92	-20	Pass
	12.5 GHz - 25 GHz	24899.28	-36.09	-20	Pass
BLE/GFSK 2 Mbps					
Low Channel, 2402 MHz	Fundamental	2401.99	N/A	N/A	N/A
	30 MHz - 12.5 GHz	2397.34	-45.51	-20	Pass
	12.5 GHz - 25 GHz	24856.55	-36.41	-20	Pass
Mid Channel, 2442 MHz	Fundamental	2441.99	N/A	N/A	N/A
	30 MHz - 12.5 GHz	1861.45	-40.62	-20	Pass
	12.5 GHz - 25 GHz	24986.27	-34.64	-20	Pass
High Channel, 2480 MHz	Fundamental	2479.99	N/A	N/A	N/A
	30 MHz - 12.5 GHz	1859.93	-34.79	-20	Pass
	12.5 GHz - 25 GHz	24943.54	-35.53	-20	Pass

SPURIOUS CONDUCTED EMISSIONS

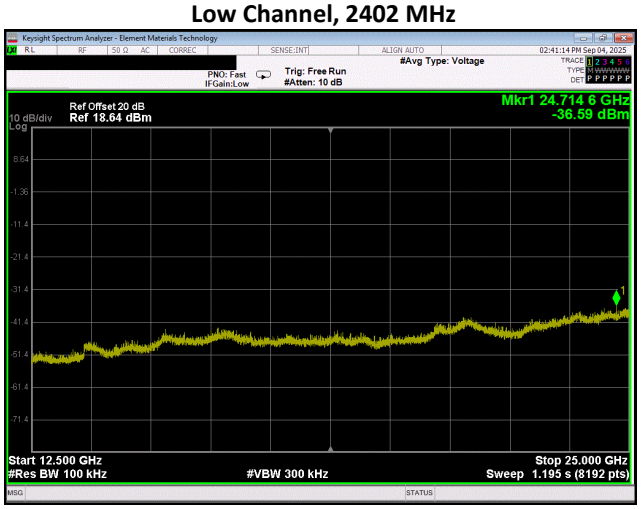
element
TbtTx 2025.05.09.1
WTD.2025.07.14.0



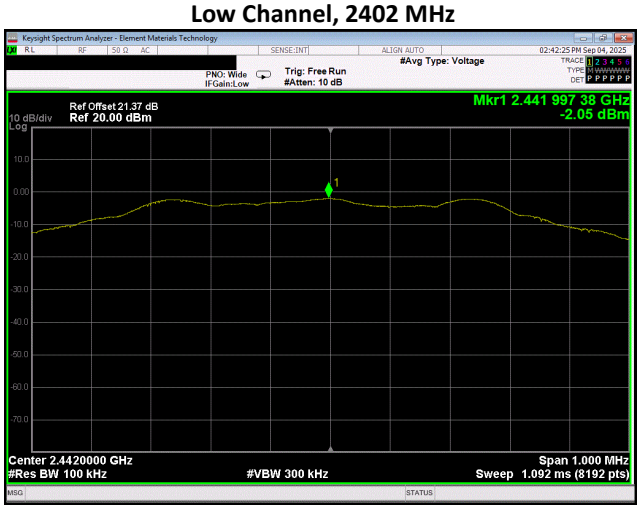
BLE/GFSK 1 Mbps
Low Channel, 2402 MHz



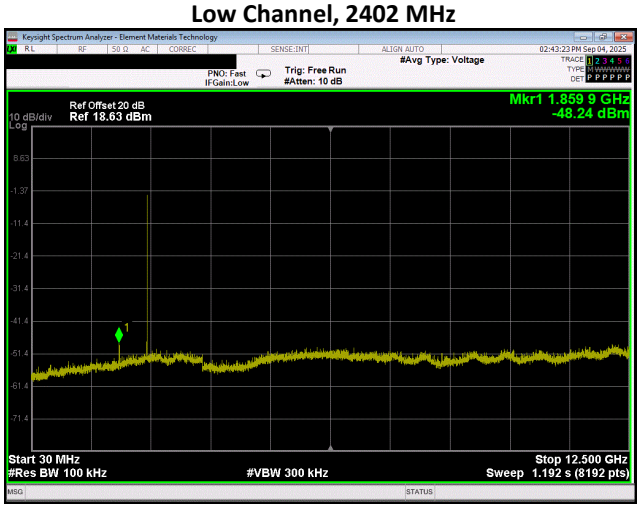
BLE/GFSK 1 Mbps
Low Channel, 2402 MHz



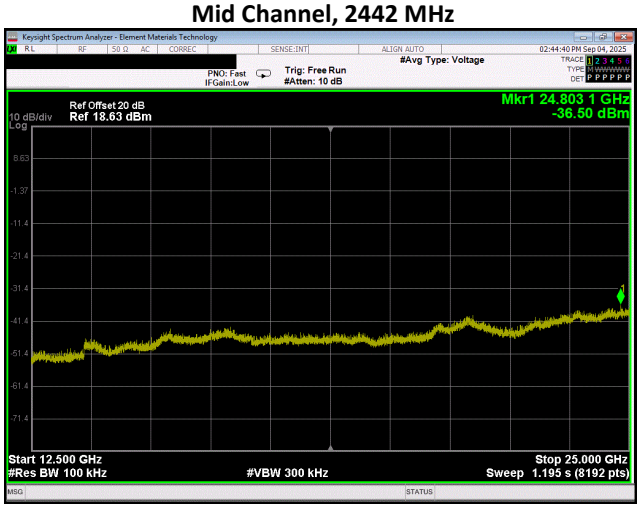
BLE/GFSK 1 Mbps
Low Channel, 2402 MHz



BLE/GFSK 1 Mbps
Mid Channel, 2442 MHz



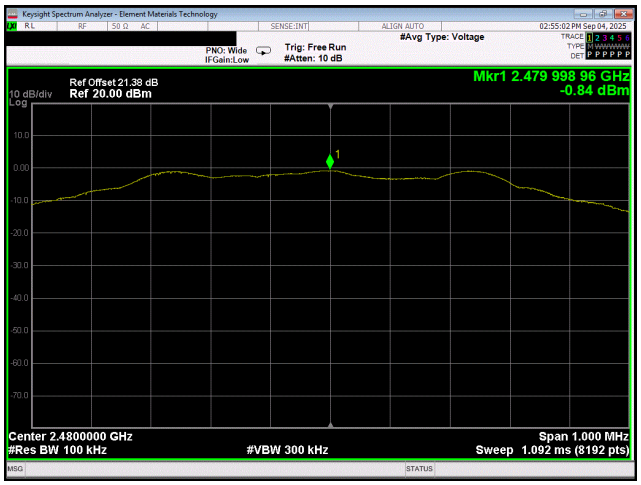
BLE/GFSK 1 Mbps
Mid Channel, 2442 MHz



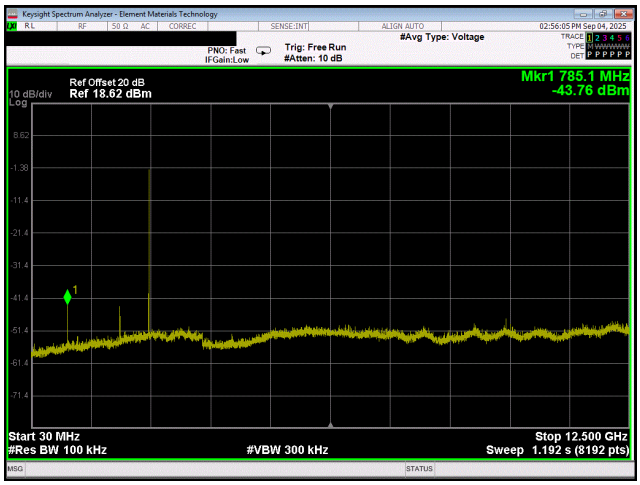
BLE/GFSK 1 Mbps
Mid Channel, 2442 MHz

SPURIOUS CONDUCTED EMISSIONS

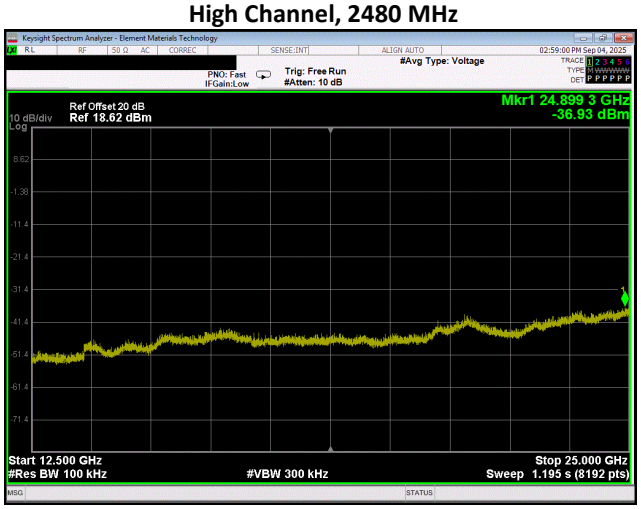
element
TbtTx 2025.05.09.1
WTD.2025.07.14.0



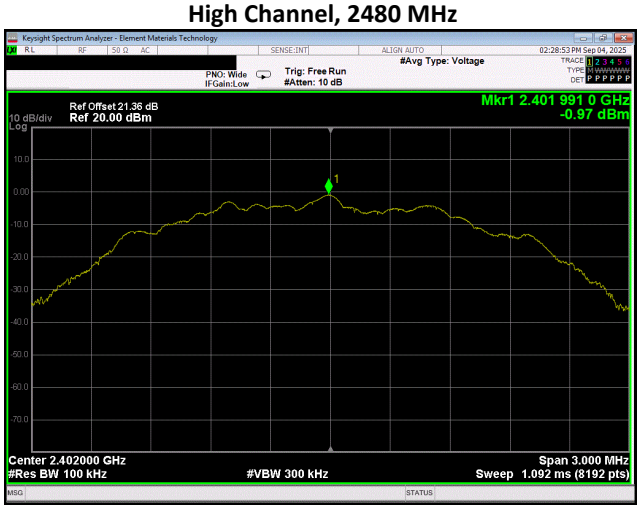
BLE/GFSK 1 Mbps
High Channel, 2480 MHz



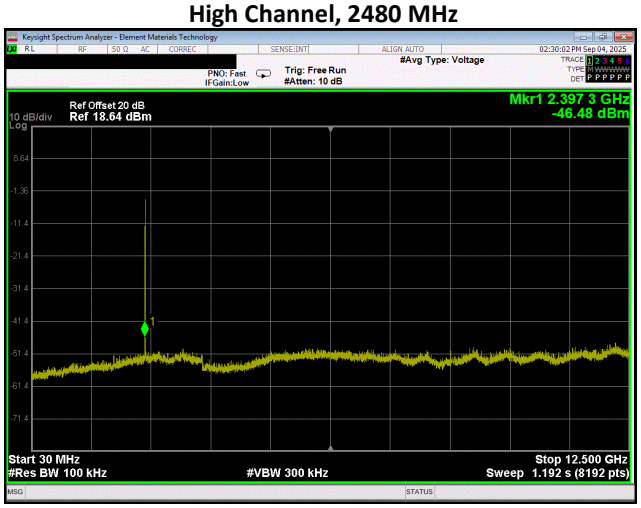
BLE/GFSK 1 Mbps
High Channel, 2480 MHz



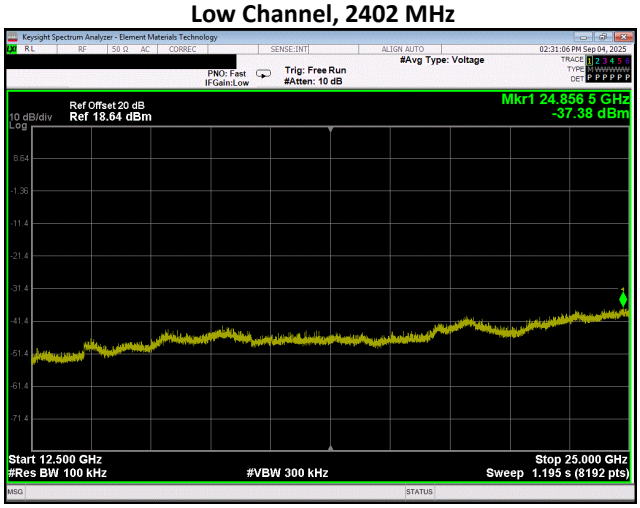
BLE/GFSK 1 Mbps
High Channel, 2480 MHz



BLE/GFSK 2 Mbps
Low Channel, 2402 MHz



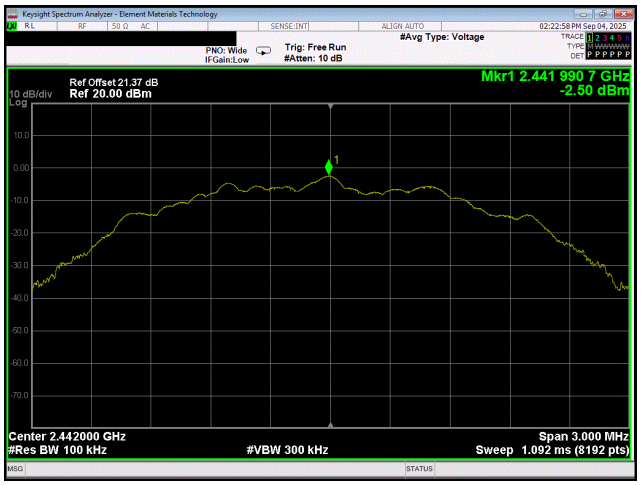
BLE/GFSK 2 Mbps
Low Channel, 2402 MHz



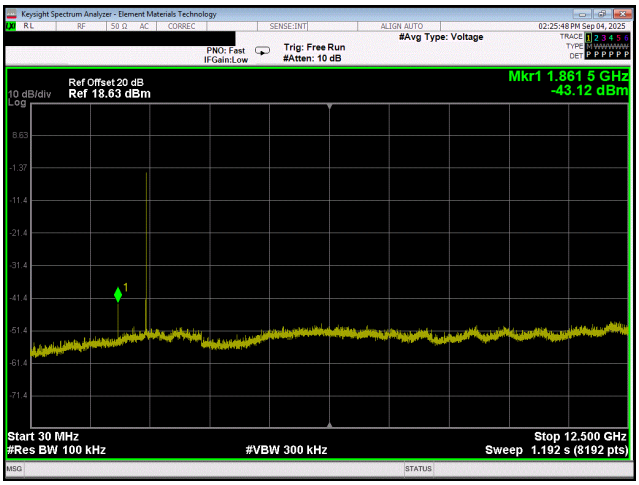
BLE/GFSK 2 Mbps
Low Channel, 2402 MHz

SPURIOUS CONDUCTED EMISSIONS

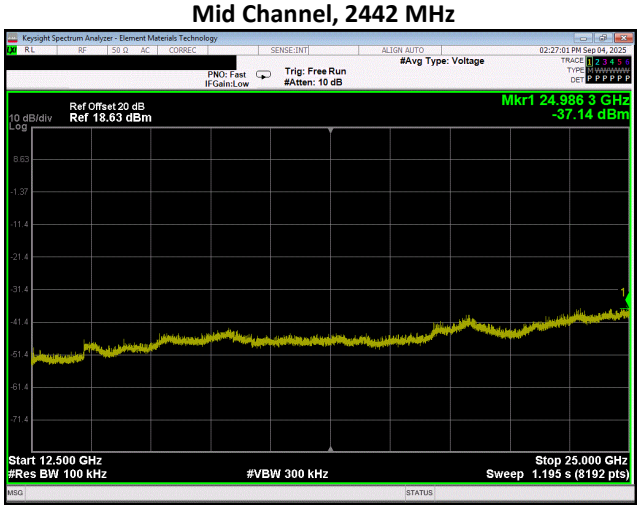
element
TbtTx 2025.05.09.1
WTD.2025.07.14.0



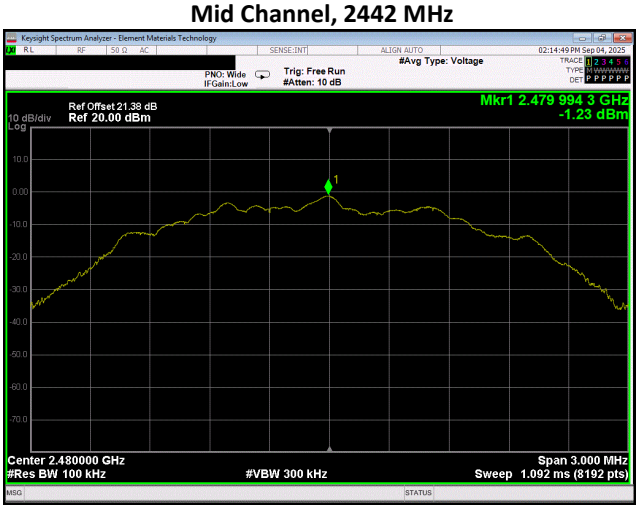
BLE/GFSK 2 Mbps
Mid Channel, 2442 MHz



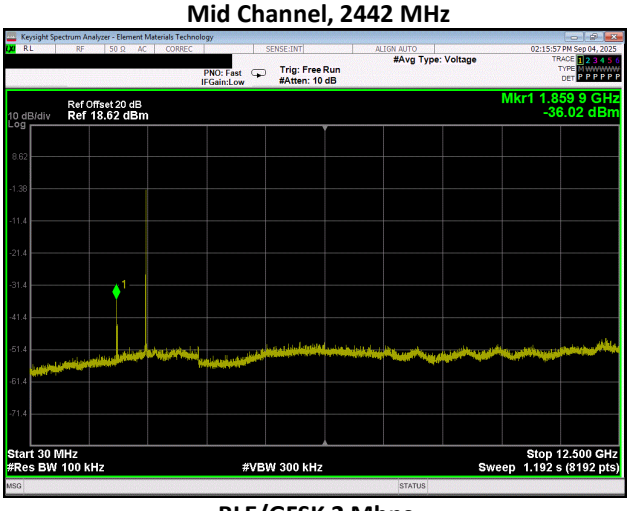
BLE/GFSK 2 Mbps
Mid Channel, 2442 MHz



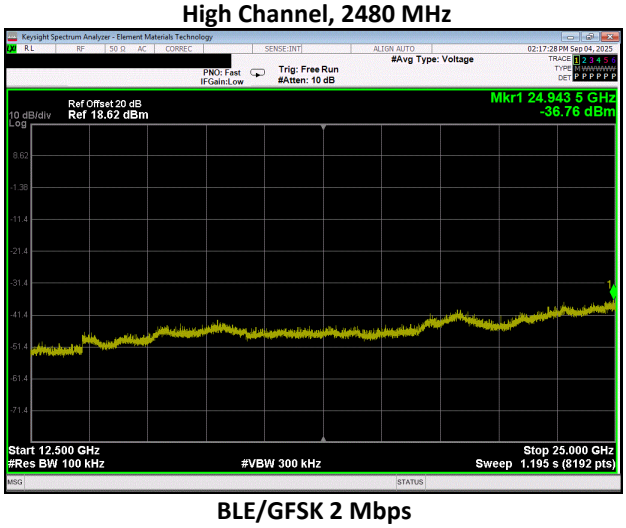
BLE/GFSK 2 Mbps
Mid Channel, 2442 MHz



BLE/GFSK 2 Mbps
High Channel, 2480 MHz



BLE/GFSK 2 Mbps
High Channel, 2480 MHz



BLE/GFSK 2 Mbps
High Channel, 2480 MHz

BAND EDGE COMPLIANCE

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

TEST DESCRIPTION

Testing was performed using the mode(s) of operation and configuration(s) noted within the report. The individuals and/or the organization requesting the test provided the modes, configurations and settings used to complete the evaluation. The actual test parameters are specified in the test data, this includes items such as investigated frequency range (scanned) and test levels. The testing methods and performance specifications, as well as the test site used for the evaluation are indicated in the test data.

The measurement was made using a direct connection between the RF output of the EUT and a spectrum analyzer.

The spurious RF conducted emissions at the edges of the authorized bands were measured with the EUT set to low and high transmit frequencies in each available band. The channels closest to the band edges were selected. The EUT was transmitting at the data rate(s) listed in the datasheet.

The spectrum was scanned below the lower band edge and above the higher band edge. The analyzer screen captures for this test show an example of the emission mask for the test mode also used during the radiated spurious emissions at the restricted band edges test.

TEST EQUIPMENT

Description	Manufacturer	Model	ID	Last Cal.	Cal. Due
Analyzer - Spectrum Analyzer	Keysight	N9010A	AFM	2025-06-09	2026-06-09
Generator - Signal	Keysight	N5182B	TFX	2023-05-14	2026-05-14
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2025-09-03	2026-09-03
Block - DC	Fairview Microwave	SD3379	ANK	2025-06-03	2026-06-03
Attenuator	S.M. Electronics	SA26B-20	RFW	2025-02-03	2026-02-03
Power Supply - DC	Agilent	U8002A	TPZ	NCR	NCR
Meter - Multimeter	Fluke	114	MMU	2025-01-30	2026-01-30
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2024-09-03	2025-09-03

BAND EDGE COMPLIANCE

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

EUT:	G Series AI BTE 13	Work Order:	STAK0373
Serial Number:	251468236	Date:	2025-09-02
Customer:	Starkey Laboratories, Inc.	Temperature:	22.7°C
Attendees:	John Quach	Relative Humidity:	53.5%
Customer Project:	None	Bar. Pressure (PMSL):	1017 mbar
Tested By:	Christopher Heintzelman	Job Site:	MN11
Power:	1.5VDC via Power Supply	Configuration:	STAK0373-2

COMMENTS

The measurement is offset by the combined loss of the measurement cable, 20db attenuator, and DC block in the measurement path.

DEVIATIONS FROM TEST STANDARD

None

CONCLUSION

Pass

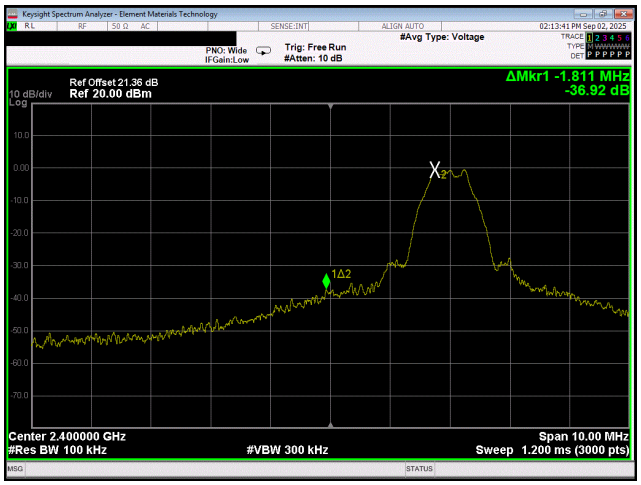
Tested By

TEST RESULTS

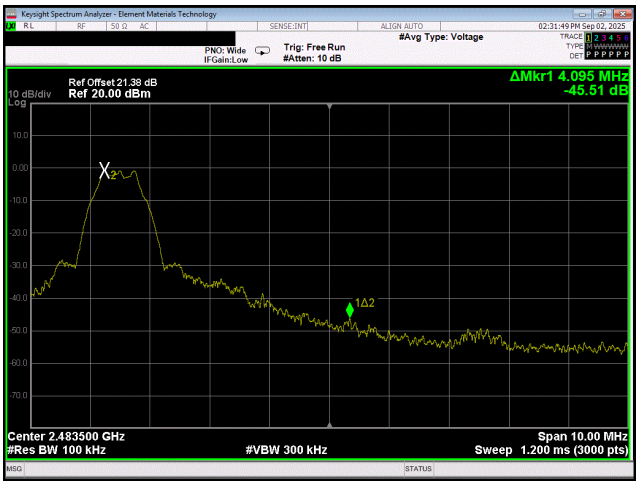
	Value (dBc)	Limit ≤ (dBc)	Result
BLE/GFSK 1 Mbps			
Low Channel, 2402 MHz	-36.92	-20	Pass
High Channel, 2480 MHz	-45.51	-20	Pass
BLE/GFSK 2 Mbps			
Low Channel, 2402 MHz	-27.2	-20	Pass
High Channel, 2480 MHz	-41.53	-20	Pass

BAND EDGE COMPLIANCE

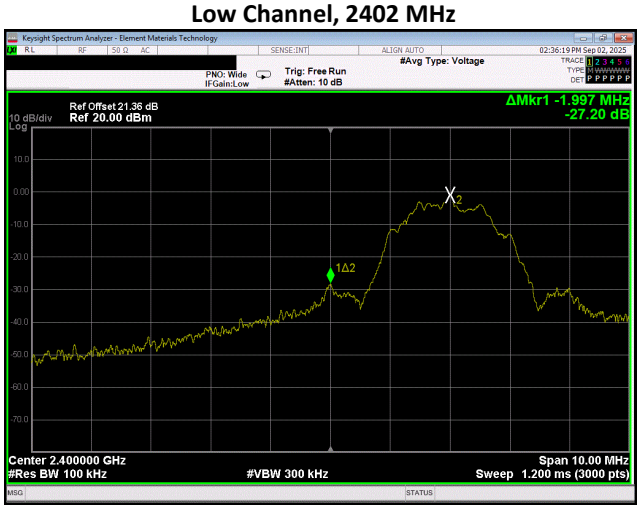
element
TbtTx 2025.05.09.1
WTD.2025.07.14.0



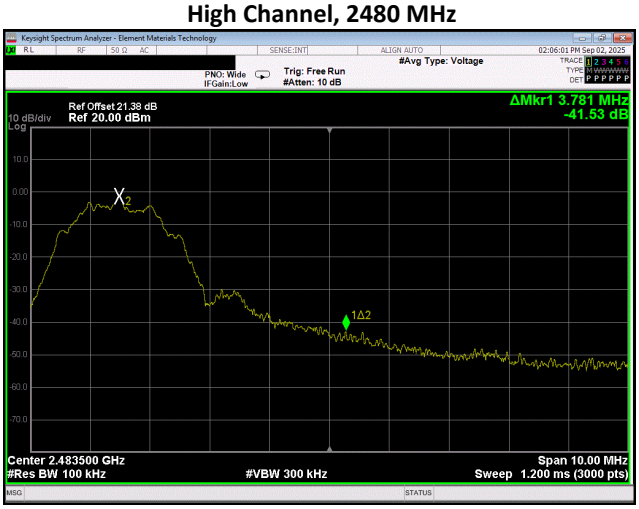
BLE/GFSK 1 Mbps
Low Channel, 2402 MHz



BLE/GFSK 1 Mbps
High Channel, 2480 MHz



BLE/GFSK 2 Mbps
Low Channel, 2402 MHz



BLE/GFSK 2 Mbps
High Channel, 2480 MHz

DTS BANDWIDTH (6 dB)

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

TEST DESCRIPTION

Testing was performed using the mode(s) of operation and configuration(s) noted within the report. The individuals and/or the organization requesting the test provided the modes, configurations and settings used to complete the evaluation. The actual test parameters are specified in the test data, this includes items such as investigated frequency range (scanned) and test levels. The testing methods and performance specifications, as well as the test site used for the evaluation are indicated in the test data.

The measurement was made using a direct connection between the RF output of the EUT and a spectrum analyzer.

The EUT was set to the channels and modes listed in the datasheet.

The 6dB DTS bandwidth was measured using the following analyzer settings:

Detector: Peak
Sweep time: Auto
Resolution Bandwidth: 1% to 5% of the OBW but not less than 100 kHz
Video Bandwidth: ≥ 3 * RBW
Trace: Max Hold
Span: Large enough to capture all products of the modulation process, including the emission skirts.

TEST EQUIPMENT

Description	Manufacturer	Model	ID	Last Cal.	Cal. Due
Generator - Signal	Keysight	N5171B (EXG)	TEY	2024-01-11	2027-01-11
Analyzer - Spectrum Analyzer	Keysight	N9010A	AFM	2025-06-09	2026-06-09
Power Supply - DC	EZ Digital Co., Ltd.	GP-4030D	TQK	NCR	NCR
Block - DC	Fairview Microwave	SD3379	ANK	2025-06-03	2026-06-03
Attenuator	S.M. Electronics	SA26B-20	RFW	2025-02-03	2026-02-03
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2024-09-03	2025-09-03
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2025-09-03	2026-09-03

DTS BANDWIDTH (6 dB)

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

EUT:	G Series AI BTE 13	Work Order:	STAK0373
Serial Number:	251468236	Date:	2025-10-13
Customer:	Starkey Laboratories, Inc.	Temperature:	22.1°C
Attendees:	John Quach	Relative Humidity:	43.7%
Customer Project:	None	Bar. Pressure (PMSL):	1020 mbar
Tested By:	Arnauld Dedry	Job Site:	MN11
Power:	1.5VDC via Power Supply	Configuration:	STAK0373-2

COMMENTS

The measurement is offset by the combined loss of the measurement cable, 20db attenuator, and DC block in the measurement path.

DEVIATIONS FROM TEST STANDARD

None

CONCLUSION

Pass

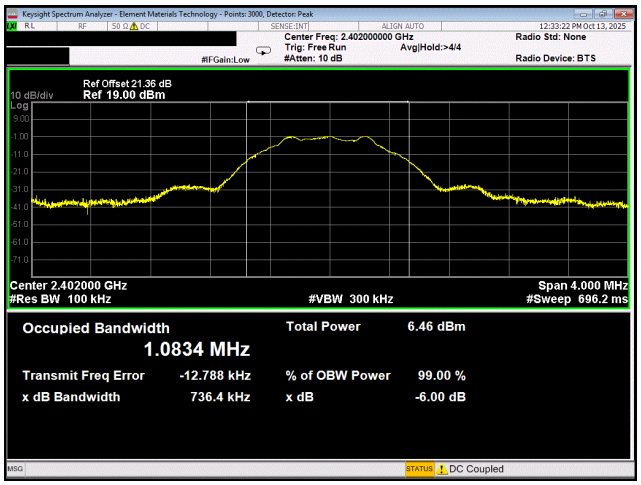
Tested By

TEST RESULTS

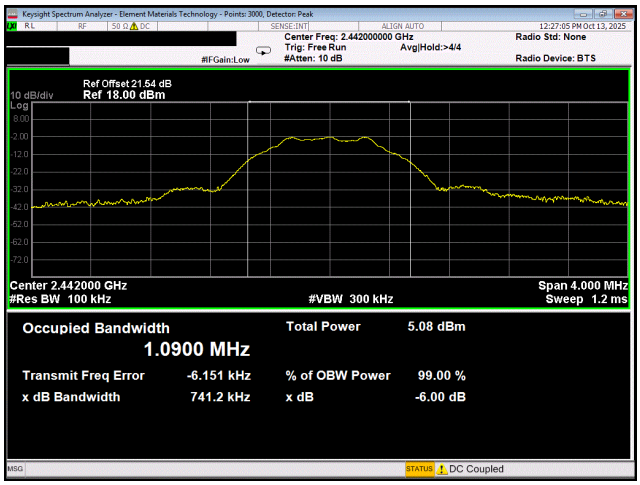
	Value	Limit (≥)	Result
BLE/GFSK 1 Mbps			
Low Channel, 2402 MHz	733.979 kHz	500 kHz	Pass
Mid Channel, 2442 MHz	739.607 kHz	500 kHz	Pass
High Channel, 2480 MHz	737.769 kHz	500 kHz	Pass
BLE/GFSK 2 Mbps			
Low Channel, 2402 MHz	1.253 MHz	500 kHz	Pass
Mid Channel, 2442 MHz	1.254 MHz	500 kHz	Pass
High Channel, 2480 MHz	1.258 MHz	500 kHz	Pass

DTS BANDWIDTH (6 dB)

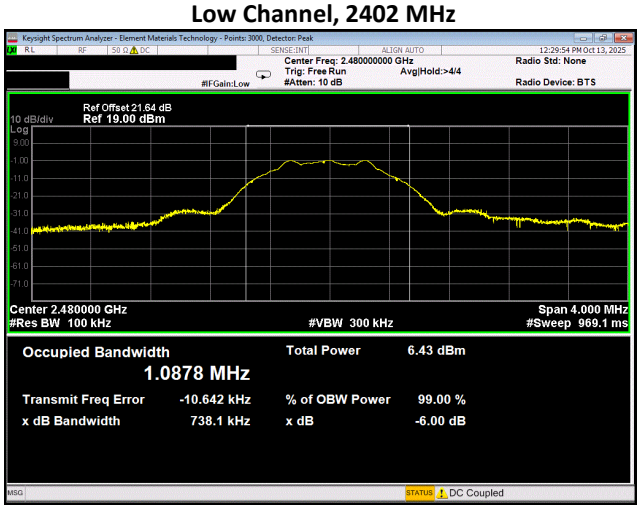
element
TbtTx 2025.05.09.1
WTD.2025.07.14.0



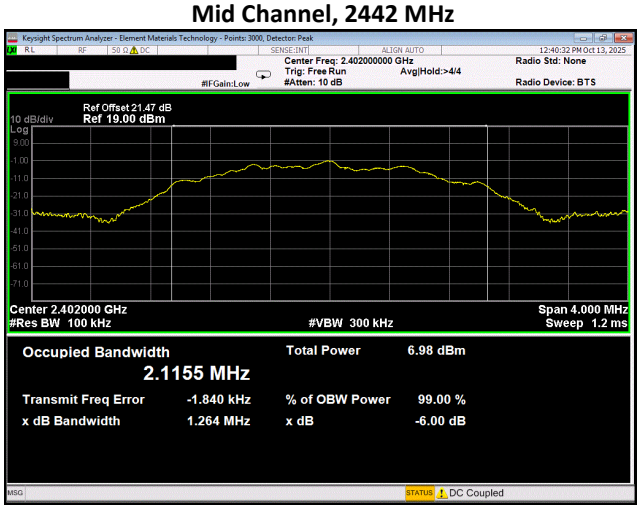
BLE/GFSK 1 Mbps
Low Channel, 2402 MHz



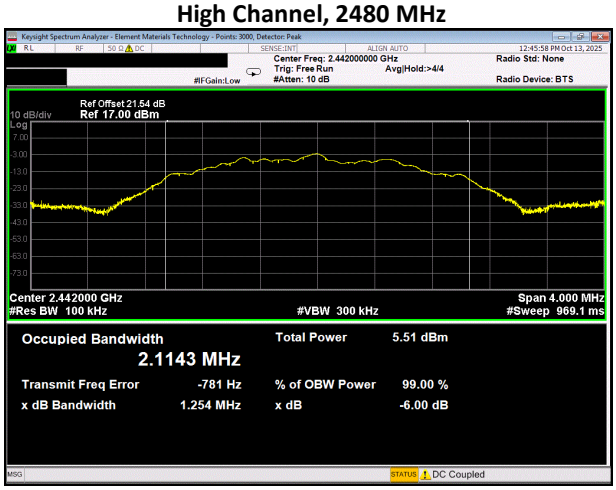
BLE/GFSK 1 Mbps
Mid Channel, 2442 MHz



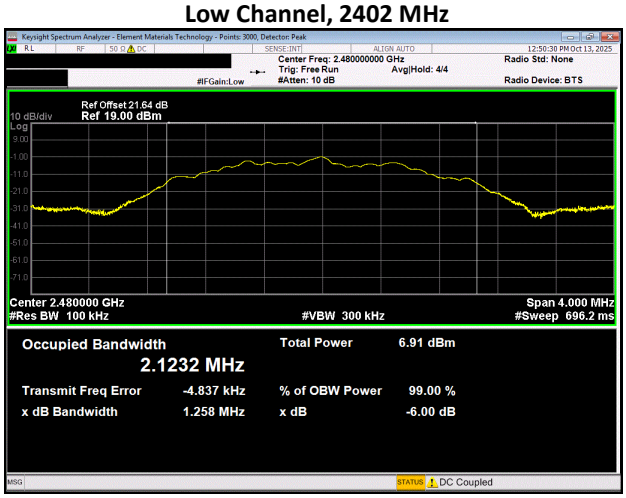
BLE/GFSK 1 Mbps
High Channel, 2480 MHz



BLE/GFSK 2 Mbps
Low Channel, 2402 MHz



BLE/GFSK 2 Mbps
Mid Channel, 2442 MHz



BLE/GFSK 2 Mbps
High Channel, 2480 MHz

DUTY CYCLE

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

TEST DESCRIPTION

Testing was performed using the mode(s) of operation and configuration(s) noted within the report. The individuals and/or the organization requesting the test provided the modes, configurations and settings used to complete the evaluation. The actual test parameters are specified in the test data, this includes items such as investigated frequency range (scanned) and test levels. The testing methods and performance specifications, as well as the test site used for the evaluation are indicated in the test data.

The measurement was made using a direct connection between the RF output of the EUT and a RF Power Sensor capable of 1 million samples per second, which only measures across the high time of the burst of the carrier. The measured level was offset by the cable loss, attenuator, and DC block that was used between the power sensor and EUT. This offset was determined prior to testing using a signal generator and spectrum analyzer.

The observed duty cycle was noted.

TEST EQUIPMENT

Description	Manufacturer	Model	ID	Last Cal.	Cal. Due
Analyzer - Spectrum Analyzer	Keysight	N9010A	AFM	2025-06-09	2026-06-09
Generator - Signal	Keysight	N5182B	TFX	2023-05-14	2026-05-14
Attenuator	S.M. Electronics	SA26B-20	RFW	2025-02-03	2026-02-03
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2025-09-03	2026-09-03
Power Supply - DC	Agilent	U8002A	TPZ	NCR	NCR
Block - DC	Fairview Microwave	SD3379	ANK	2025-06-03	2026-06-03
Meter - Multimeter	Fluke	114	MMU	2025-01-30	2026-01-30
Power Meter	ETS Lindgren	7002-008	SRA	2025-02-18	2026-02-18
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2024-09-03	2025-09-03

DUTY CYCLE

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

EUT:	G Series AI BTE 13	Work Order:	STAK0373
Serial Number:	251468236	Date:	2025-09-02
Customer:	Starkey Laboratories, Inc.	Temperature:	22.7°C
Attendees:	John Quach	Relative Humidity:	54.4%
Customer Project:	None	Bar. Pressure (PMSL):	1018 mbar
Tested By:	Christopher Heintzelman	Job Site:	MN11
Power:	1.5VDC via Power Supply	Configuration:	STAK0373-2

COMMENTS

None

DEVIATIONS FROM TEST STANDARD

None

CONCLUSION

N/A

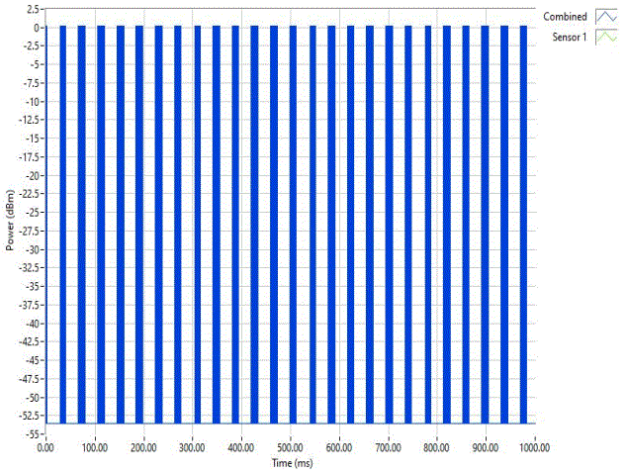
Tested By

TEST RESULTS

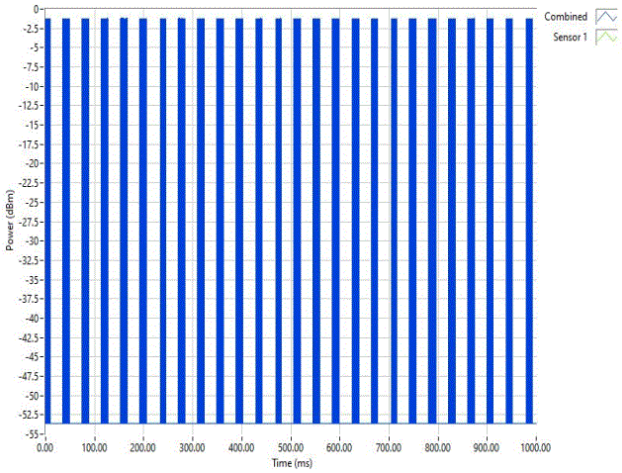
	Duty Cycle (%)	Limit (dBm)	Results
Normal Test Conditions			
BLE/GFSK 1 Mbps Low Channel, 2402 MHz	21.849	N/A	N/A
BLE/GFSK 1 Mbps Mid Channel, 2442 MHz	22.21	N/A	N/A
BLE/GFSK 1 Mbps High Channel, 2480 MHz	22.216	N/A	N/A
BLE/GFSK 2 Mbps Low Channel, 2402 MHz	15.934	N/A	N/A
BLE/GFSK 2 Mbps Mid Channel, 2442 MHz	16.023	N/A	N/A
BLE/GFSK 2 Mbps High Channel, 2480 MHz	16.032	N/A	N/A

DUTY CYCLE

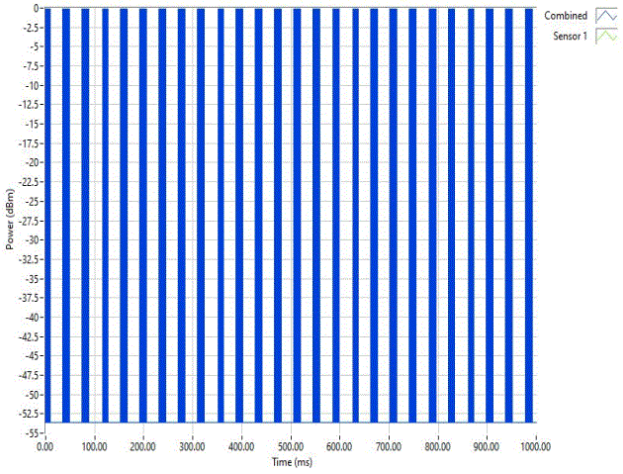
element
TbtTx 2025.05.09.1
WTD.2025.07.14.0



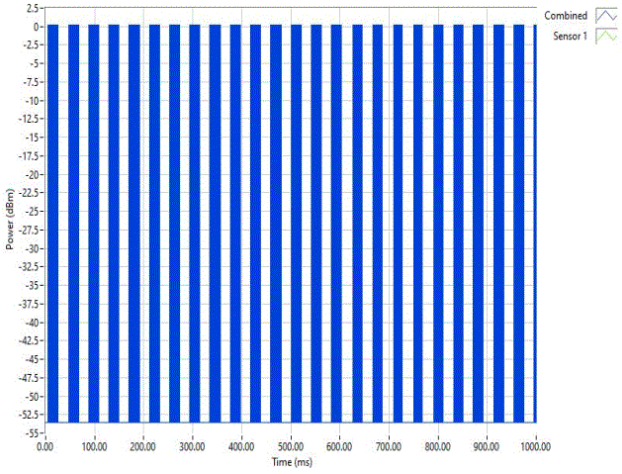
Normal Test Conditions
BLE/GFSK 1 Mbps Low Channel, 2402 MHz



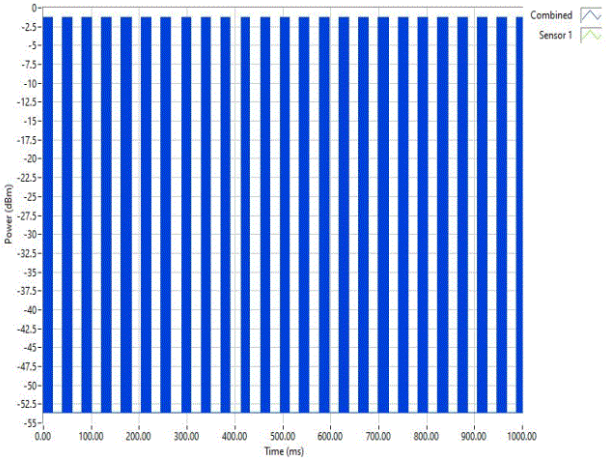
Normal Test Conditions
BLE/GFSK 1 Mbps Mid Channel, 2442 MHz



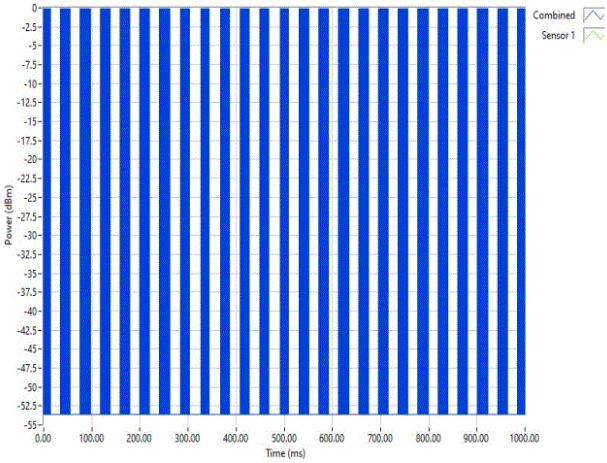
Normal Test Conditions
BLE/GFSK 1 Mbps High Channel, 2480 MHz



Normal Test Conditions
BLE/GFSK 2 Mbps Low Channel, 2402 MHz



Normal Test Conditions
BLE/GFSK 2 Mbps Mid Channel, 2442 MHz



Normal Test Conditions
BLE/GFSK 2 Mbps High Channel, 2480 MHz

EQUIVALENT ISOTROPIC RADIATED POWER (EIRP)

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

TEST DESCRIPTION

Testing was performed using the mode(s) of operation and configuration(s) noted within the report. The individuals and/or the organization requesting the test provided the modes, configurations and settings used to complete the evaluation. The actual test parameters are specified in the test data, this includes items such as investigated frequency range (scanned) and test levels. The testing methods and performance specifications, as well as the test site used for the evaluation are indicated in the test data.

The measurement was made using a direct connection between the RF output of the EUT and a spectrum analyzer.

The transmit frequency was set to the required channels in each band. The transmit power was set to its default maximum.

Prior to measuring peak transmit power the DTS bandwidth (B) was measured.

The method found in ANSI C63.10:2020 Section 11.9.1.1 was used because the RBW on the analyzer was greater than the DTS Bandwidth of the radio.

Equivalent Isotropic Radiated Power (EIRP) = Max Measured Power + Antenna gain (dBi)

Analyzer settings:

Detector: Peak
Sweep time: Auto
Resolution Bandwidth: ≥ DTS bandwidth
Video Bandwidth: ≥ 3 * RBW
Trace: Max Hold

TEST EQUIPMENT

Description	Manufacturer	Model	ID	Last Cal.	Cal. Due
Analyzer - Spectrum Analyzer	Keysight	N9010A	AFM	2025-06-09	2026-06-09
Generator - Signal	Keysight	N5182B	TFX	2023-05-14	2026-05-14
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2025-09-03	2026-09-03
Block - DC	Fairview Microwave	SD3379	ANK	2025-06-03	2026-06-03
Attenuator	S.M. Electronics	SA26B-20	RFW	2025-02-03	2026-02-03
Power Supply - DC	Agilent	U8002A	TPZ	NCR	NCR
Meter - Multimeter	Fluke	114	MMU	2025-01-30	2026-01-30
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2024-09-03	2025-09-03

EQUIVALENT ISOTROPIC RADIATED POWER (EIRP)

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

EUT:	G Series AI BTE 13	Work Order:	STAK0373
Serial Number:	251468236	Date:	2025-09-02
Customer:	Starkey Laboratories, Inc.	Temperature:	22.8°C
Attendees:	John Quach	Relative Humidity:	54.6%
Customer Project:	None	Bar. Pressure (PMSL):	1017 mbar
Tested By:	Christopher Heintzelman	Job Site:	MN11
Power:	1.5VDC via Power Supply	Configuration:	STAK0373-2

COMMENTS

The measurement is offset by the combined loss of the measurement cable, 20db attenuator, and DC block in the measurement path.
Power Setting +2.

DEVIATIONS FROM TEST STANDARD

None

CONCLUSION

Pass

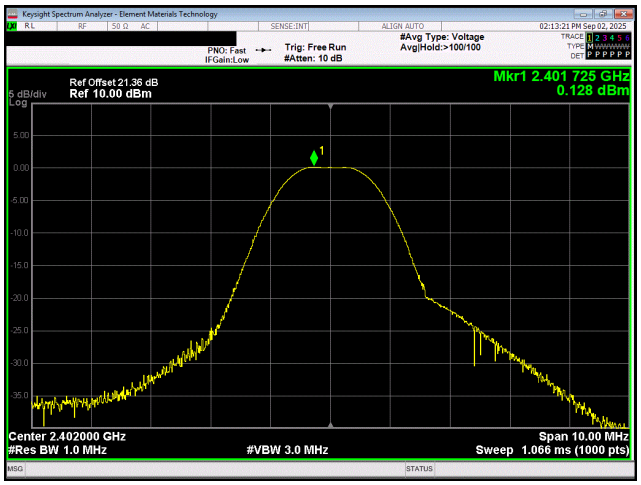
Tested By

TEST RESULTS

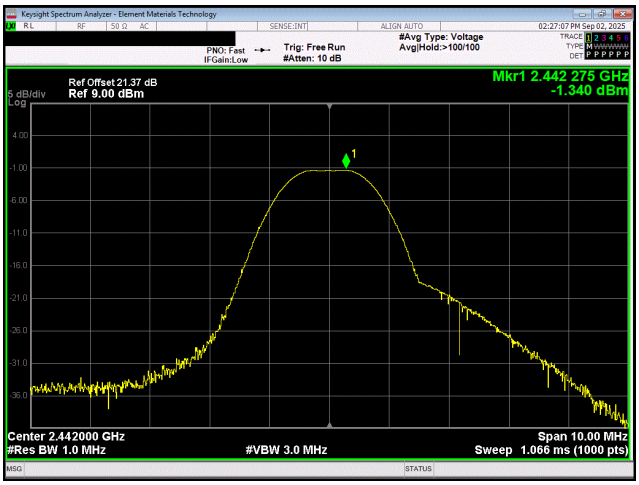
	Out Pwr (dBm)	Antenna Gain (dBi)	EIRP (dBm)	EIRP Limit (dBm)	Result
BLE/GFSK 1 Mbps					
Low Channel, 2402 MHz	0.128	-6	-5.872	36	Pass
Mid Channel, 2442 MHz	-1.34	-6	-7.34	36	Pass
High Channel, 2480 MHz	-0.165	-6	-6.165	36	Pass
BLE/GFSK 2 Mbps					
Low Channel, 2402 MHz	0.191	-6	-5.809	36	Pass
Mid Channel, 2442 MHz	-1.282	-6	-7.282	36	Pass
High Channel, 2480 MHz	-0.117	-6	-6.117	36	Pass

EQUIVALENT ISOTROPIC RADIATED POWER (EIRP)

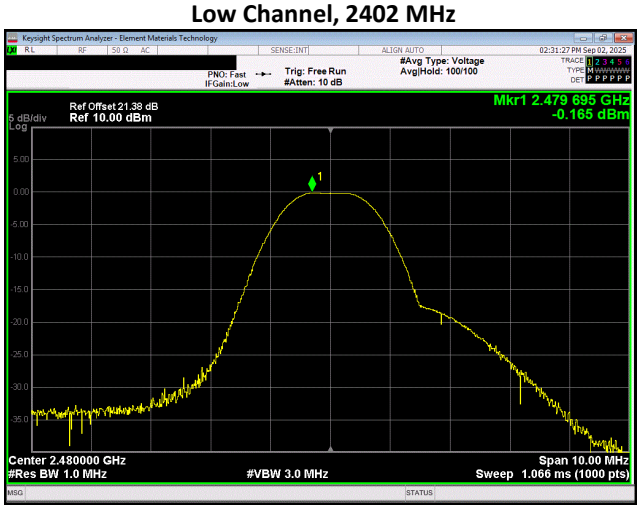
element
TbtTx 2025.05.09.1
WTD.2025.07.14.0



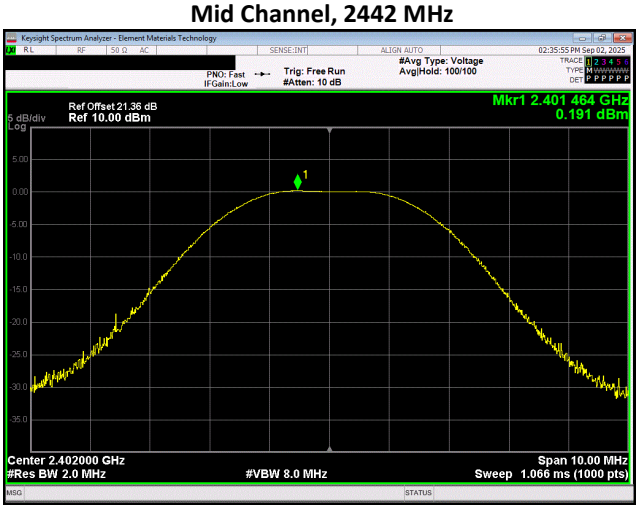
BLE/GFSK 1 Mbps
Low Channel, 2402 MHz



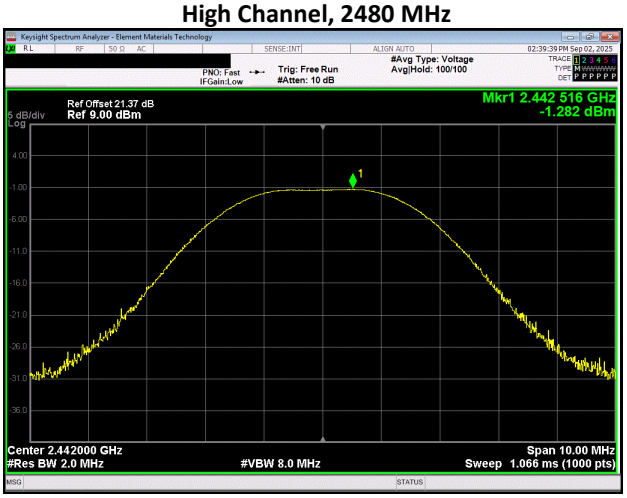
BLE/GFSK 1 Mbps
Mid Channel, 2442 MHz



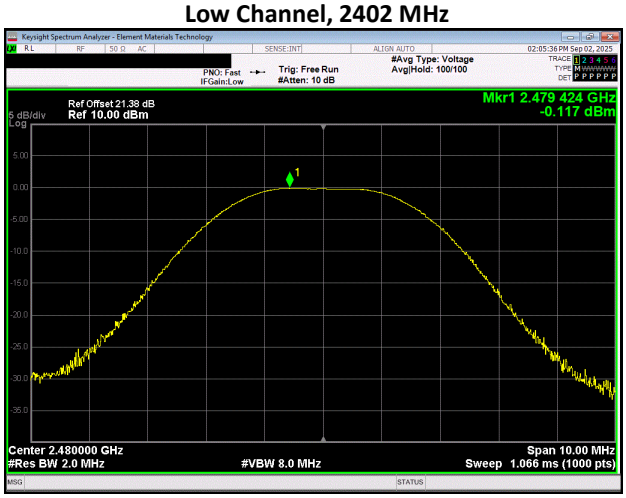
BLE/GFSK 1 Mbps
High Channel, 2480 MHz



BLE/GFSK 2 Mbps
Low Channel, 2402 MHz



BLE/GFSK 2 Mbps
Mid Channel, 2442 MHz



BLE/GFSK 2 Mbps
High Channel, 2480 MHz

OCCUPIED BANDWIDTH (99%)

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

TEST DESCRIPTION

Testing was performed using the mode(s) of operation and configuration(s) noted within the report. The individuals and/or the organization requesting the test provided the modes, configurations and settings used to complete the evaluation. The actual test parameters are specified in the test data, this includes items such as investigated frequency range (scanned) and test levels. The testing methods and performance specifications, as well as the test site used for the evaluation are indicated in the test data.

The measurement was made using a direct connection between the RF output of the EUT and a spectrum analyzer.

The 99% occupied bandwidth was measured with the EUT configured for continuous modulated operation.

Per ANSI C63.10:2020, 6.9.3, the spectrum analyzer was configured as follows:

Sweep time: Auto
Resolution Bandwidth: 1% to 5% of the OBW
Video Bandwidth: ≥ 3 * RBW
Trace: Max Hold
Span: Large enough to capture all products of the modulation process, including the emission skirts.

A sample detector was used unless the device was not able to be operated in a continuous transmit mode, in which case a peak detector was used.

The spectrum analyzer occupied bandwidth measurement function was used to sum the power of the transmission in linear terms to obtain the 99% bandwidth.

TEST EQUIPMENT

Description	Manufacturer	Model	ID	Last Cal.	Cal. Due
Analyzer - Spectrum Analyzer	Keysight	N9010A	AFM	2025-06-09	2026-06-09
Generator - Signal	Keysight	N5182B	TFX	2023-05-14	2026-05-14
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2025-09-03	2026-09-03
Block - DC	Fairview Microwave	SD3379	ANK	2025-06-03	2026-06-03
Attenuator	S.M. Electronics	SA26B-20	RFW	2025-02-03	2026-02-03
Power Supply - DC	Agilent	U8002A	TPZ	NCR	NCR
Meter - Multimeter	Fluke	114	MMU	2025-01-30	2026-01-30
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2024-09-03	2025-09-03

OCCUPIED BANDWIDTH (99%)

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

EUT:	G Series AI BTE 13	Work Order:	STAK0373
Serial Number:	251468236	Date:	2025-09-02
Customer:	Starkey Laboratories, Inc.	Temperature:	22.7°C
Attendees:	John Quach	Relative Humidity:	53.5%
Customer Project:	None	Bar. Pressure (PMSL):	1017 mbar
Tested By:	Christopher Heintzelman	Job Site:	MN11
Power:	1.5VDC via Power Supply	Configuration:	STAK0373-2

COMMENTS

The measurement is offset by the combined loss of the measurement cable, 20db attenuator, and DC block in the measurement path.

DEVIATIONS FROM TEST STANDARD

None

CONCLUSION

N/A

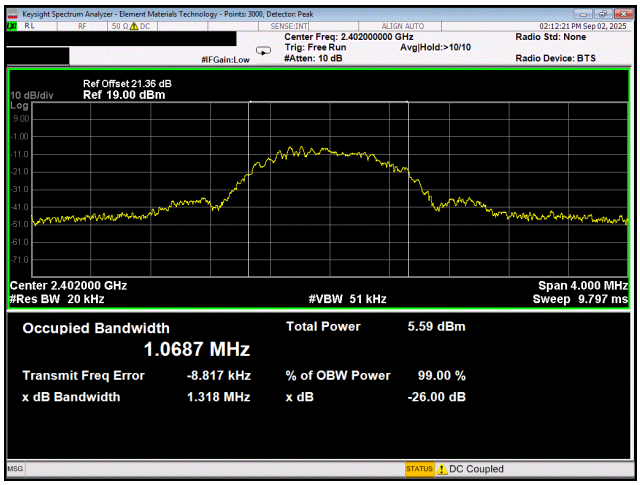
Tested By

TEST RESULTS

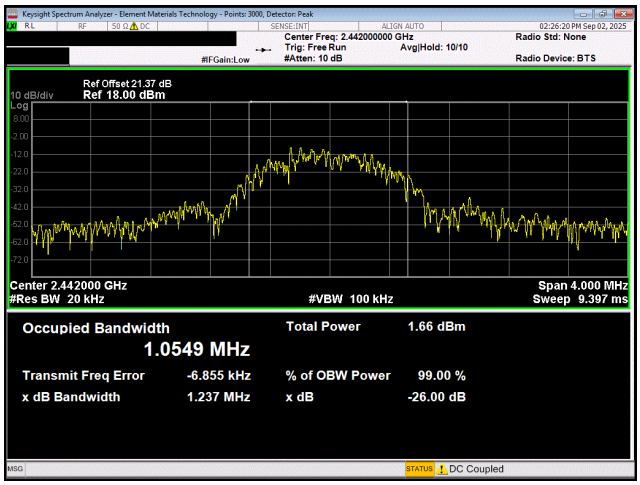
	Value	Limit	Result
BLE/GFSK 1 Mbps			
Low Channel, 2402 MHz	1.067 MHz	N/A	N/A
Mid Channel, 2442 MHz	1.055 MHz	N/A	N/A
High Channel, 2480 MHz	1.072 MHz	N/A	N/A
BLE/GFSK 2 Mbps			
Low Channel, 2402 MHz	2.146 MHz	N/A	N/A
Mid Channel, 2442 MHz	2.122 MHz	N/A	N/A
High Channel, 2480 MHz	2.127 MHz	N/A	N/A

OCCUPIED BANDWIDTH (99%)

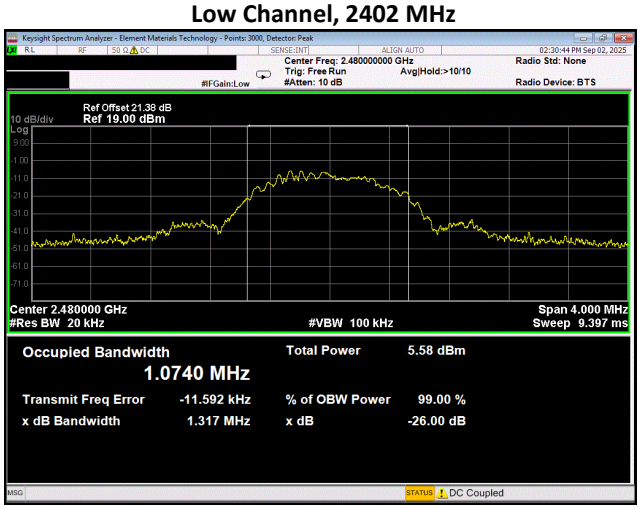
element
TbtTx 2025.05.09.1
WTD.2025.07.14.0



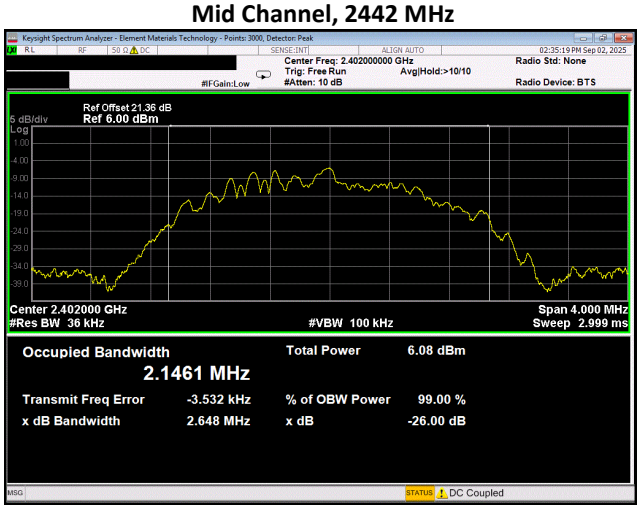
BLE/GFSK 1 Mbps
Low Channel, 2402 MHz



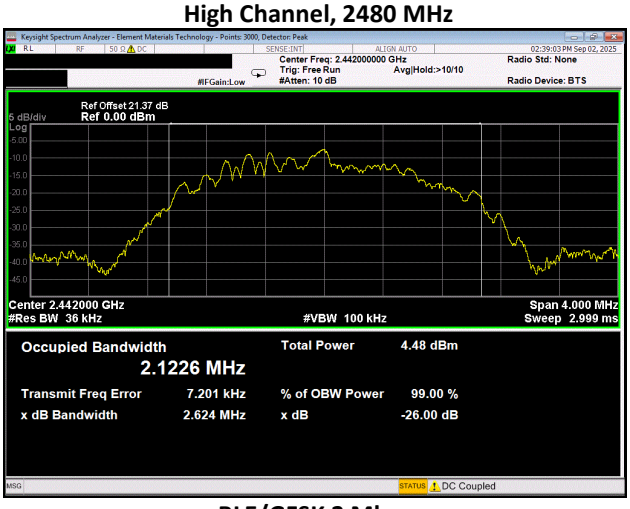
BLE/GFSK 1 Mbps
Mid Channel, 2442 MHz



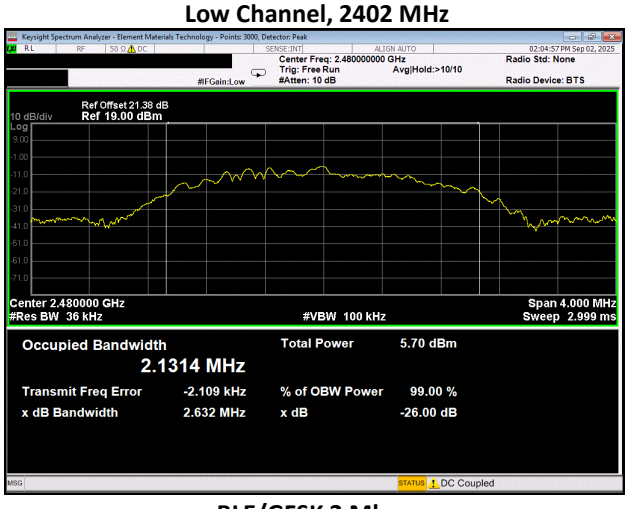
BLE/GFSK 1 Mbps
High Channel, 2480 MHz



BLE/GFSK 2 Mbps
Low Channel, 2402 MHz



BLE/GFSK 2 Mbps
Mid Channel, 2442 MHz



BLE/GFSK 2 Mbps
High Channel, 2480 MHz

OUTPUT POWER

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

TEST DESCRIPTION

Testing was performed using the mode(s) of operation and configuration(s) noted within the report. The individuals and/or the organization requesting the test provided the modes, configurations and settings used to complete the evaluation. The actual test parameters are specified in the test data, this includes items such as investigated frequency range (scanned) and test levels. The testing methods and performance specifications, as well as the test site used for the evaluation are indicated in the test data.

The measurement was made using a direct connection between the RF output of the EUT and a spectrum analyzer.

The transmit frequency was set to the required channels in each band. The transmit power was set to its default maximum.

Prior to measuring peak transmit power the DTS bandwidth (B) was measured.

The method found in ANSI C63.10:2020 Section 11.9.1.1 was used because the RBW on the analyzer was greater than the DTS Bandwidth of the radio.

Analyzer settings:

Detector: Peak
Sweep time: Auto
Resolution Bandwidth: ≥ DTS bandwidth
Video Bandwidth: ≥ 3 * RBW
Trace: Max Hold

TEST EQUIPMENT

Description	Manufacturer	Model	ID	Last Cal.	Cal. Due
Analyzer - Spectrum Analyzer	Keysight	N9010A	AFM	2025-06-09	2026-06-09
Generator - Signal	Keysight	N5182B	TFX	2023-05-14	2026-05-14
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2025-09-03	2026-09-03
Block - DC	Fairview Microwave	SD3379	ANK	2025-06-03	2026-06-03
Attenuator	S.M. Electronics	SA26B-20	RFW	2025-02-03	2026-02-03
Power Supply - DC	Agilent	U8002A	TPZ	NCR	NCR
Meter - Multimeter	Fluke	114	MMU	2025-01-30	2026-01-30
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2024-09-03	2025-09-03

OUTPUT POWER

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

EUT:	G Series AI BTE 13	Work Order:	STAK0373
Serial Number:	251468236	Date:	2025-09-02
Customer:	Starkey Laboratories, Inc.	Temperature:	22.7°C
Attendees:	John Quach	Relative Humidity:	53%
Customer Project:	None	Bar. Pressure (PMSL):	1017 mbar
Tested By:	Christopher Heintzelman	Job Site:	MN11
Power:	1.5VDC via Power Supply	Configuration:	STAK0373-2

COMMENTS

The measurement is offset by the combined loss of the measurement cable, 20db attenuator, and DC block in the measurement path.
Power setting +2.

DEVIATIONS FROM TEST STANDARD

None

CONCLUSION

Pass

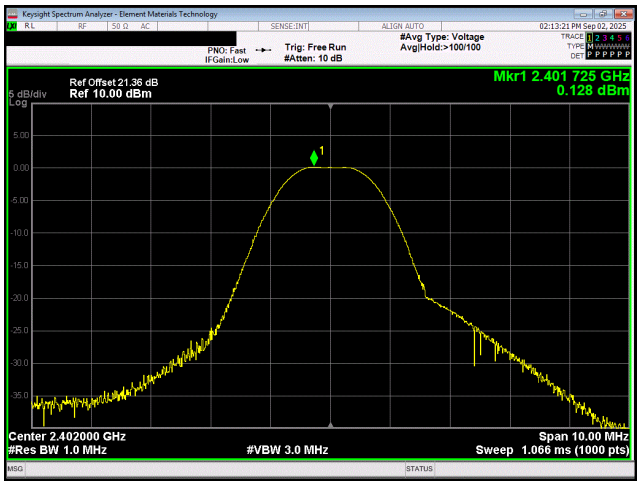
Tested By

TEST RESULTS

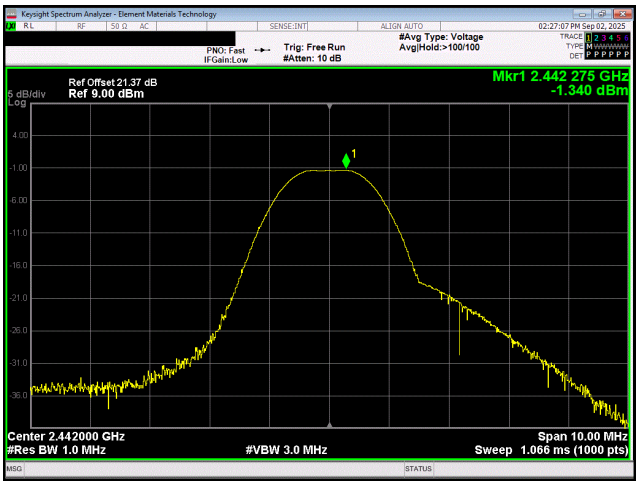
	Out Pwr (dBm)	Limit (dBm)	Result
BLE/GFSK 1 Mbps			
Low Channel, 2402 MHz	0.128	30	Pass
Mid Channel, 2442 MHz	-1.34	30	Pass
High Channel, 2480 MHz	-0.165	30	Pass
BLE/GFSK 2 Mbps			
Low Channel, 2402 MHz	0.191	30	Pass
Mid Channel, 2442 MHz	-1.282	30	Pass
High Channel, 2480 MHz	-0.117	30	Pass

OUTPUT POWER

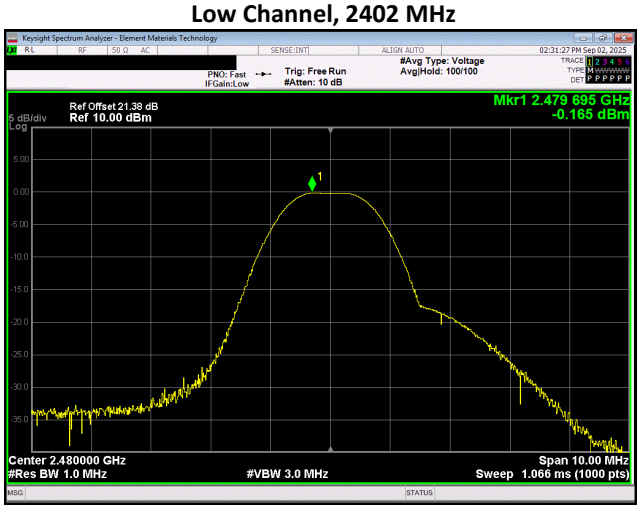
element
TbtTx 2025.05.09.1
WTD.2025.07.14.0



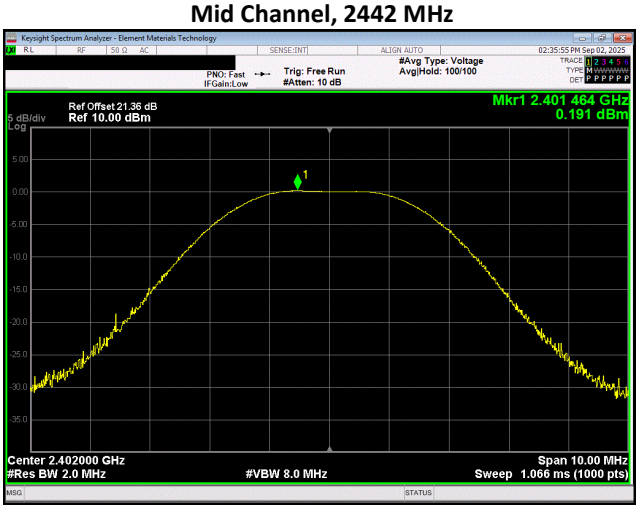
BLE/GFSK 1 Mbps
Low Channel, 2402 MHz



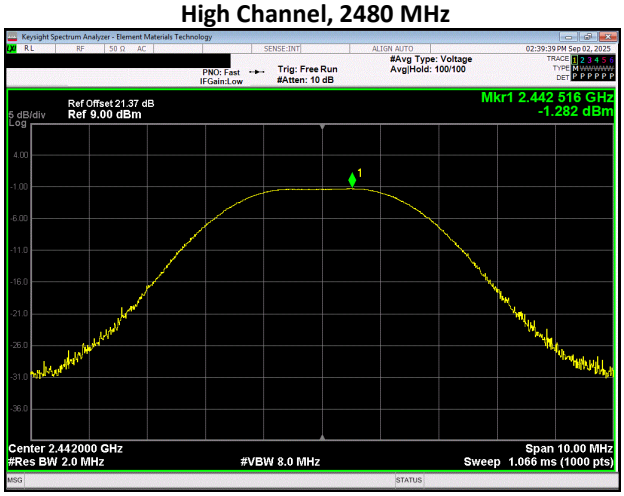
BLE/GFSK 1 Mbps
Mid Channel, 2442 MHz



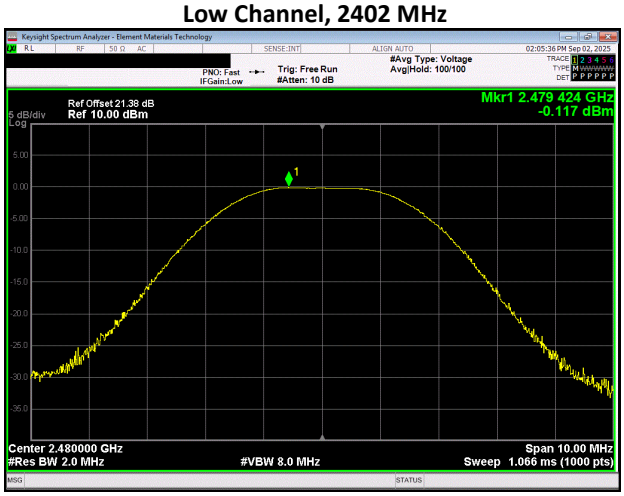
BLE/GFSK 1 Mbps
High Channel, 2480 MHz



BLE/GFSK 2 Mbps
Low Channel, 2402 MHz



BLE/GFSK 2 Mbps
Mid Channel, 2442 MHz



BLE/GFSK 2 Mbps
High Channel, 2480 MHz

POWER SPECTRAL DENSITY

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

TEST DESCRIPTION

Testing was performed using the mode(s) of operation and configuration(s) noted within the report. The individuals and/or the organization requesting the test provided the modes, configurations and settings used to complete the evaluation. The actual test parameters are specified in the test data, this includes items such as investigated frequency range (scanned) and test levels. The testing methods and performance specifications, as well as the test site used for the evaluation are indicated in the test data.

The measurement was made using a direct connection between the RF output of the EUT and a spectrum analyzer.

The maximum power spectral density measurements was measured using the channels and modes as called out on the following data sheets.

Per the procedure outlined in ANSI C63.10 the peak power spectral density was measured in a 3 kHz RBW.

TEST EQUIPMENT

Description	Manufacturer	Model	ID	Last Cal.	Cal. Due
Analyzer - Spectrum Analyzer	Keysight	N9010A	AFM	2025-06-09	2026-06-09
Generator - Signal	Keysight	N5182B	TFX	2023-05-14	2026-05-14
Cable	Micro-Coax	UFD150A-1-0720-200200	MNL	2025-09-03	2026-09-03
Block - DC	Fairview Microwave	SD3379	ANK	2025-06-03	2026-06-03
Attenuator	S.M. Electronics	SA26B-20	RFW	2025-02-03	2026-02-03
Power Supply - DC	Agilent	U8002A	TPZ	NCR	NCR
Meter - Multimeter	Fluke	114	MMU	2025-01-30	2026-01-30

POWER SPECTRAL DENSITY

element
TbtTx 2025.05.09.1
WTD.2025.07.14.0

EUT:	G Series AI BTE 13	Work Order:	STAK0373
Serial Number:	251468236	Date:	2025-09-02
Customer:	Starkey Laboratories, Inc.	Temperature:	22.8°C
Attendees:	John Quach	Relative Humidity:	54.7%
Customer Project:	None	Bar. Pressure (PMSL):	1017 mbar
Tested By:	Christopher Heintzelman	Job Site:	MN11
Power:	1.5VDC via Power Supply	Configuration:	STAK0373-2

COMMENTS

The measurement is offset by the combined loss of the measurement cable, 20db attenuator, and DC block in the measurement path.

DEVIATIONS FROM TEST STANDARD

None

CONCLUSION

Pass

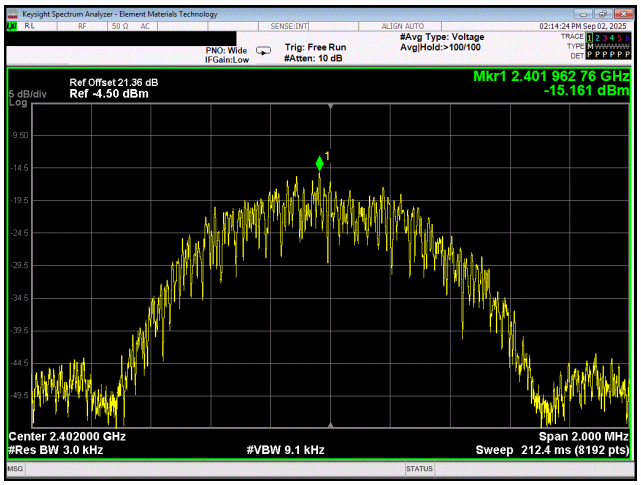
Tested By

TEST RESULTS

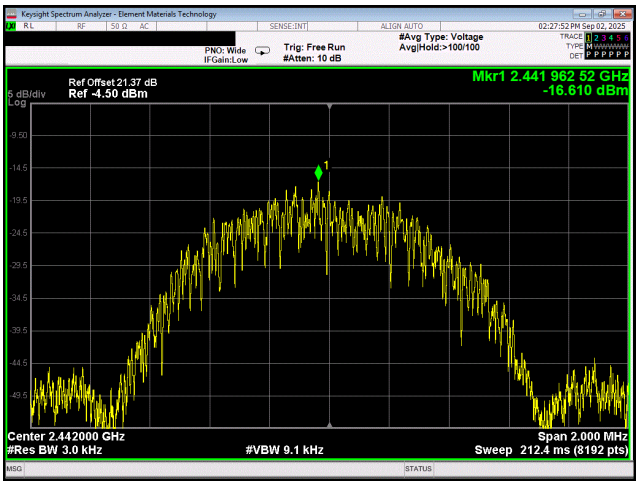
	Value dBm/3kHz	Limit ≤ (dBm/3kHz)	Results
BLE/GFSK 1 Mbps			
Low Channel, 2402 MHz	-15.161	8	Pass
Mid Channel, 2442 MHz	-16.61	8	Pass
High Channel, 2480 MHz	-15.409	8	Pass
BLE/GFSK 2 Mbps			
Low Channel, 2402 MHz	-17.583	8	Pass
Mid Channel, 2442 MHz	-19.13	8	Pass
High Channel, 2480 MHz	-17.899	8	Pass

POWER SPECTRAL DENSITY

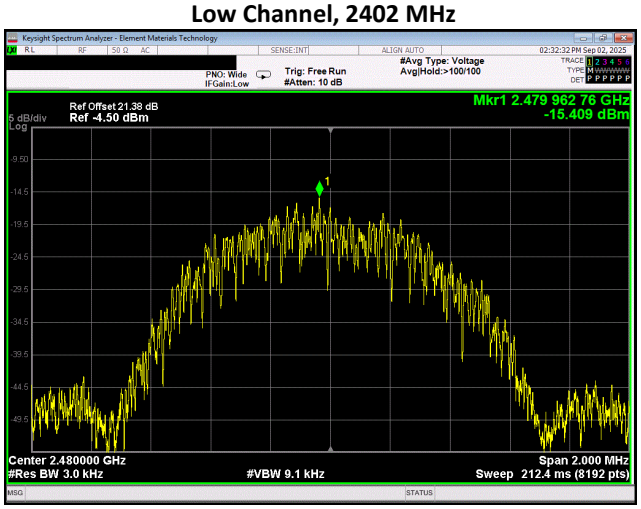
element
TbtTx 2025.05.09.1
WTD.2025.07.14.0



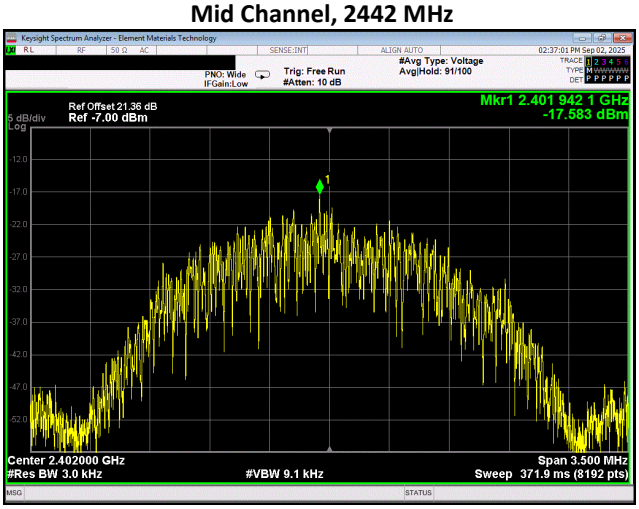
BLE/GFSK 1 Mbps
Low Channel, 2402 MHz



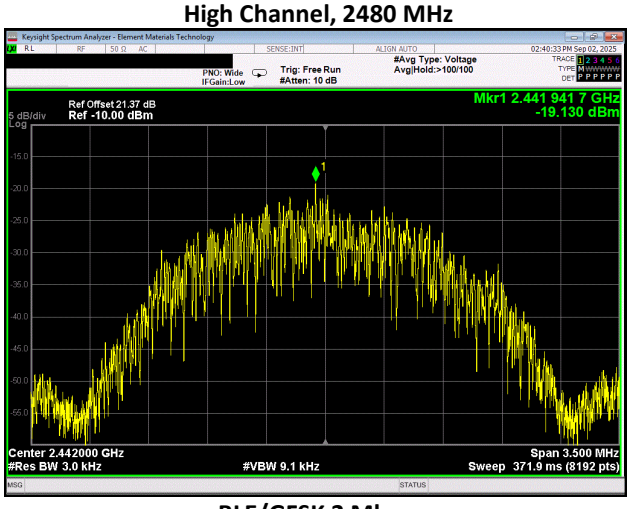
BLE/GFSK 1 Mbps
Mid Channel, 2442 MHz



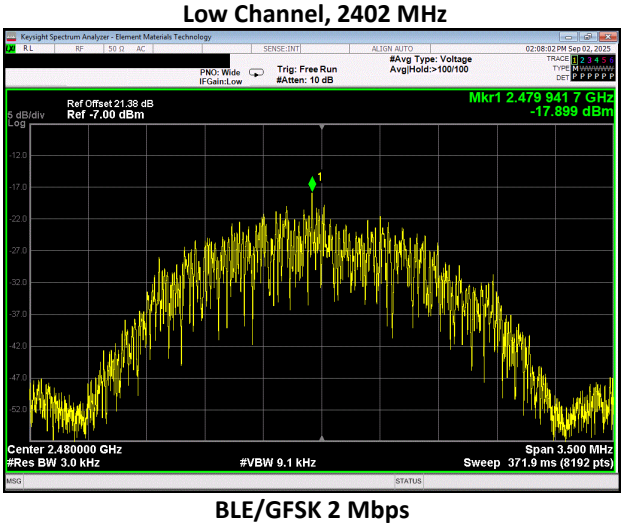
BLE/GFSK 1 Mbps
High Channel, 2480 MHz



BLE/GFSK 2 Mbps
Low Channel, 2402 MHz



BLE/GFSK 2 Mbps
Mid Channel, 2442 MHz



BLE/GFSK 2 Mbps
High Channel, 2480 MHz

RADIATED BAND EDGE EMISSIONS

element
EmiR5 2025.04.30.2
WTD.2025.03.25.0

TEST DESCRIPTION

Testing was performed using the mode(s) of operation and configuration(s) noted within the report. The individuals and/or the organization requesting the test provided the modes, configurations and settings used to complete the evaluation. The actual test parameters are specified in the test data, this includes items such as investigated frequency range (scanned) and test levels. The testing methods and performance specifications, as well as the test site used for the evaluation are indicated in the test data.

The measurement was made in a radiated configuration of the fundamental with the carrier fully maximized for its highest radiated power.

The highest gain antenna of each type to be used with the EUT was tested. The EUT was configured for the required transmit frequencies and the modes as showed in the data sheets.

The emissions from the EUT were maximized by rotating the EUT on a turntable, adjusting the position of the EUT and EUT antenna in three orthogonal axis if required, and adjusting the measurement antenna height and polarization (per ANSI C63.10). A preamp and attenuation were used (if needed) for this test in order to provide sufficient measurement sensitivity.

Measurements were made with the required detectors and annotated on the data for each individual point using the following annotation:

PK = Peak Detector
AV = RMS Detector

Measurements within 2 MHz of the allowable band may have been taken using the integration method from ANSI C63.10 clause 11.13.3. This procedure uses the channel power feature of the spectrum analyzer to integrate the power of the emission within a 1 MHz bandwidth.

TEST EQUIPMENT

Description	Manufacturer	Model	ID	Last Cal.	Cal. Due
Attenuator	Fairview Microwave	SA18H-20	VAF	2025-09-03	2026-09-03
Antenna - Double Ridge	ETS Lindgren	3115	AIP	2024-08-02	2026-08-02
Cable	ESM Cable Corp.	Double Ridge Guide Horn Cables	MNI	2024-11-26	2025-11-26
Amplifier - Pre-Amplifier	Miteq	AMF-3D-00100800-32-13P	AVT	2025-01-08	2026-01-08
Analyzer - Spectrum Analyzer	Agilent	E4446A	AAQ	2025-04-11	2026-04-11

RADIATED BAND EDGE EMISSIONS

element
EmiR5 2025.04.30.2
WTD.2025.03.25.0

EUT:	G Series AI BTE 13	Work Order:	STAK0373
Serial Number:	251468235	Date:	2025-09-29
Customer:	Starkey Laboratories, Inc.	Temperature:	22.5°C
Attendees:	John Quach	Relative Humidity:	52.2%
Customer Project:	None	Bar. Pressure (PMSL):	1020 mbar
Tested By:	Arnauld Dedry	Job Site:	MN09
Power:	1.5VDC Battery Powered	Configuration:	STAK0373-1

COMMENTS

All orientations of the EUT were investigated. The worst-case results are reported below.

As per FCC KDB 558074 (QA 3 a). The average measurements were determined by subtracting the operational duty cycle (as given by the client) from the peak measurements. The downward correction applied to the peak measurements was determined by using 10*log10(operational duty cycle).
Operational duty cycle for 1 Mbps is 16% and 7% for 2 Mbps
DCCF 1 Mbps = 10*log(0.16) = -8 dB
DCCF 2 Mbps = 10*log(0.07) = -11.5 dB

DEVIATIONS FROM TEST STANDARD

None

CONCLUSION

Pass

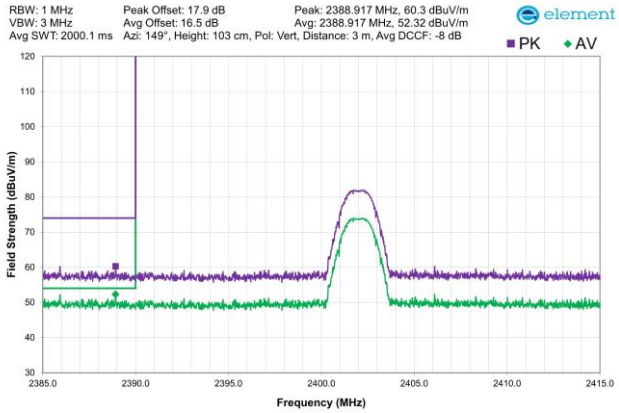
Tested By

TEST RESULTS

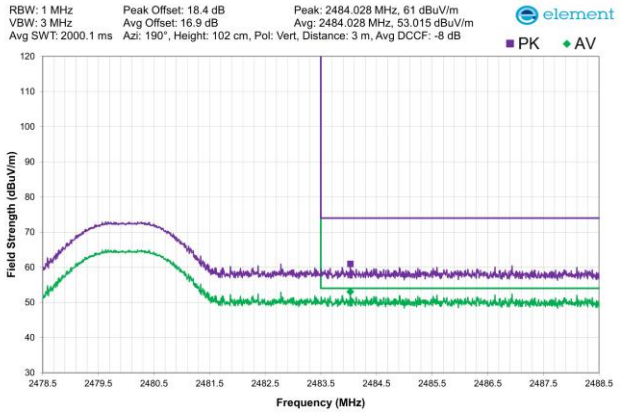
	Frequency (MHz)	PK (dBuV/m) AV (dBuV/m)	PK Lim (dBuV/m) AV Lim (dBuV/m)	Worst Margin (dB)	Pol. (H/V)	EUT Orientation	Results
BLE/GFSK 1 Mbps							
Low Channel, 2402 MHz	2388.917 2388.917	60.3 52.3	74.0 54.0	-1.7	V	on Side	Pass
High Channel, 2480 MHz	2483.993 2483.883	60.9 52.9	74.0 54.0	-1.1	V	on Side	Pass
BLE/GFSK 2 Mbps							
Low Channel, 2402 MHz	2386.126 2386.126	59.6 48.1	74.0 54.0	-5.9	V	on Side	Pass
High Channel, 2480 MHz	2485.774 2485.774	60.4 48.8	74.0 54.0	-5.2	V	on Side	Pass

RADIATED BAND EDGE EMISSIONS

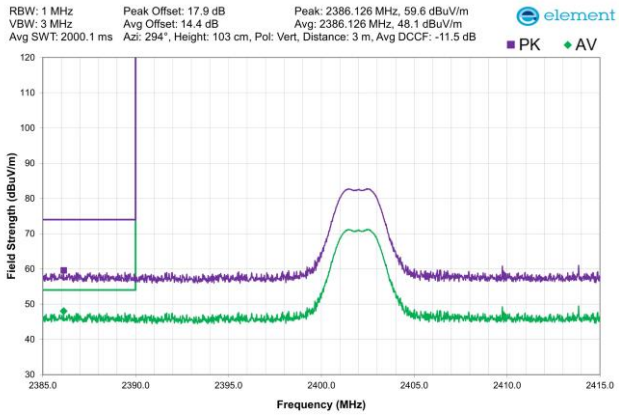
element
EmiR5 2025.04.30.2
WTD.2025.03.25.0



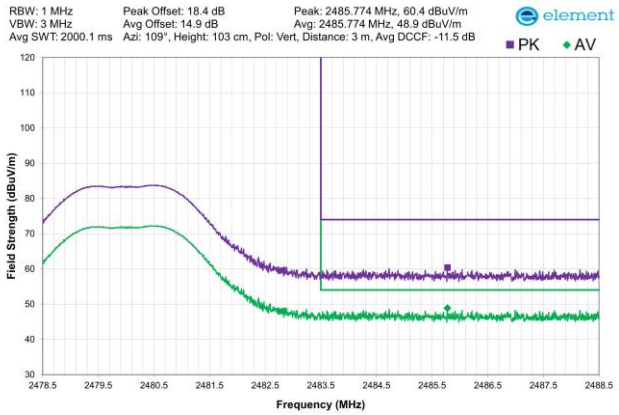
BLE/GFSK 1 Mbps
Low Channel, 2402 MHz



BLE/GFSK 1 Mbps
High Channel, 2480 MHz



BLE/GFSK 2 Mbps
Low Channel, 2402 MHz



BLE/GFSK 2 Mbps
High Channel, 2480 MHz

End of Test Report