

VTech Communications Limited

Application
For
Class II Permissive Change

900MHz 30 Channels Analog Modulation Cordless
Telephone with Answering Machine

(FCC ID: EW79108)

WO# 00013911
PKL/at
April 11, 2000

- The test results reported in this report shall refer only to the sample actually tested and shall not refer or be deemed to refer to bulk from which such a sample may be said to have been obtained.
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FCC ID: EW79108

Intertek Testing Services Hong Kong Ltd.

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LIST OF EXHIBITS

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MEASUREMENT/TECHNICAL REPORT

VTech Communications Limited - MODEL: VTech 9151
FCC ID: EW79108

This report concerns (check one:) Original Grant _____ Class II Change X

Equipment Type : Cordless Telephone (example : computer, modem, transmitter, etc.)

Deferred grant requested per 47 CFR 0.457(d)(1)(ii)? Yes _____ No X

If yes, defer until : _____
date

Company Name agrees to notify the Commission by: _____
date

of the intended date of announcement of the product so that the grant can be issued on that date.

Transition Rules Request per 15.37 ? Yes _____ No X

If no, assumed Part 15, Subpart C for intentional radiator - the new 47 CFR [10-1-98 Edition] Provision.

Report prepared by:

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List of attached file

Exhibit type	File Description	filename
Cover Letter	Letter of Agency	letter.pdf
Test Report	Test Report	report.doc
Operation Description	Technical Description	descri.pdf
Test Setup Photo	Radiated Emission for Base	base1.jpg, base2.jpg
Test Setup Photo	Radiated Emission for Handset	handset1.jpg, handset2.jpg
Test Report	Emission Plot	emission.pdf
Test Setup Photo	Conducted Emission	conduct1.jpg to conduct3.jpg
Test Report	Conducted Emission Test Result	conduct.pdf
External Photo	External Photo	ophoto1.jpg, ophoto2.jpg
Internal Photo	Internal Photo	ipphoto1.jpg to ipphoto11.jpg
Block Diagram	Block Diagram	block.pdf
Schematics	Circuit Diagram	circuit.pdf
ID Label/Location	Label Artwork and Location	label.pdf
User Manual	User Manual	manual.pdf

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EXHIBIT 1 GENERAL DESCRIPTION

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1.0 **General Description**

1.1 Product Description

The VTech 9151 is a 900MHz 30 Channels Analog Modulation Cordless Telephone with Answering Machine. The unit is capable of either tone or pulse dialing. The internal power supply's isolation is accomplished through a power transformer having an adequate dielectric rating. The circuit wiring is consistent under the requirement of part 68.

The handset unit consists of a keypad with twelve standard keys (0,...9,*,#), four function keys (Off, Program, Memory, Redial), and one channel switch key. A phone key is provided to control pick/release telephone line in a toggle base.

The base unit has a page key, which is used to page the handset unit. In addition, there are other functional keys such as Rec/Memo, Answer On/Off, Mailbox 1, Mailbox 2, Mailbox 3, Delete, Time/Set, Select, Menu, Repeat/Slow, Skip/Quick, Volume Up and Volume Down which are for the answering machine feature.

The circuit description is saved with filename: descri.pdf

Connection between the device and the telephone network is accomplished through the use of USOC RJ11C in the 2-wire loop calling central office line.

1.2 Purpose of the change

The purpose of this application is to modify the circuitry and PCB layout for adding digital answering machine function and the RF circuitry remains the same.

1.3 Related Submittal(s) Grants

This is an Application for Certification of a cordless telephone system. Two transmitters are included in this Application. This specific report details the emission characteristics of each transmitter. The receivers are subject to the verification authorization process, in accordance with 15.101(b). A verification report has been prepared for the receiver sections of each device. The device is also subject to Part 68 Registration.

1.4 Test Methodology

Both AC mains line-conducted and radiated emission measurements were performed according to the procedures in ANSI C63.4 (1992). All measurements were performed in Open Area Test Sites. Preliminary scans were performed in the Open Area Test Sites only to determine worst case modes. All Radiated tests were performed at an antenna to EUT distance of 3 meters, unless stated otherwise in the "**Justification Section**" of this Application.

1.5 Test Facility

The open area test site and conducted measurement facility used to collect the radiated data is located at Garment Centre, 576 Castle Peak Road, Kowloon, Hong Kong. This test facility and site measurement data have been fully placed on file with the FCC.

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**EXHIBIT 2
SYSTEM TEST CONFIGURATION**

2.0 System Test Configuration

2.1 Justification

For emission testing, the equipment under test (EUT) was configured for testing in a typical fashion (as a customer would normally use it). During testing, all cables were manipulated to produce worst case emissions. The handset was powered by a fully charged battery.

For the measurements, the EUT is attached to a cardboard box and placed on the wooden turntable. If the base unit attaches to peripherals, they are connected and operational (as typical as possible). The handset is remotely located as far from the antenna and the base as possible to ensure full power transmission from the base. Else, the base is wired to transmit full power without modulation.

The signal is maximized through rotation and placement in the three orthogonal axes. The antenna height and polarization are varied during the search for maximum signal level. The antenna height is varied from 1 to 4 meters. Detector function is in peak mode. Radiated emissions are taken at three meters unless the signal level is too low for measurement at that distance. If necessary, a pre-amplifier is used and/or the test is conducted at a closer distance.

All readings are extrapolated back to the equivalent three meter reading using inverse scaling with distance. Analyzer resolution is 100 kHz or greater. All emissions greater than 20 dB μ V/m are recorded.

Radiated emission measurement were performed from 30 MHz to tenth harmonics.

2.2 EUT Exercising Software

The EUT exercise program used during radiated and conducted testing was designed to exercise the various system components in a manner similar to a typical use.

For emissions testing, the units were setup to transmit continuously to simplify the measurement methodology. Care was taken to ensure proper power supply voltages during testing.

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2.3 Support Equipment List and Description

The FCC ID's for all equipment, plus descriptions of all cables used in the tested system (included inserted cards, which have grants) are:

HARDWARE:

The unit was operated standalone. An AC adapter (provided with the unit) was used to power the device. Its description is listed below.

- (1) AC adapter with two meter unshielded power cord permanently affixed.

CABLES:

- (1) Telecommunication cable with RJ11C connectors (1m, unshielded), terminated

OTHERS:

- (1) A headset for telephone use with 1.2m unshielded cable permanently affixed.

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2.4 Equipment Modification

Any modifications installed previous to testing by VTech Communications Limited will be incorporated in each production model sold/leased in the United States.

No modifications were installed by ETL Division, Intertek Testing Services Hong Kong Ltd.

All the items listed under section 2.0 of this report are confirmed by:

Confirmed by:

*Wilson Loke
Manager
Intertek Testing Services
Agent for VTech Communications Limited*

Signature

Date

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EXHIBIT 3 EMISSION RESULTS

3.0 Emission Results

Data is included of the worst case configuration (the configuration which resulted in the highest emission levels). A sample calculation, configuration photographs and data tables of the emissions are included.

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3.1 Field Strength Calculation

The field strength is calculated by adding the Antenna Factor and Cable Factor, and subtracting the Amplifier Gain (if any) from the measured reading. The basic equation with a sample calculation is as follows:

$$FS = RA + AF + CF - AG$$

where FS = Field Strength in dB μ V/m
 RA = Receiver Amplitude (including preamplifier) in dB μ V
 CF = Cable Attenuation Factor in dB
 AF = Antenna Factor in dB
 AG = Amplifier Gain in dB

In the following table(s), the reading shown on the data table reflects the preamplifier gain. An example for the calculations in the following table is as follows:-

$$FS = RR + LF$$

where FS = Field Strength in dB μ V/m
 RR = RA - AG in dB μ V
 LF = CF + AF in dB

Assume a receiver reading of 52.0 dB μ V is obtained. The antenna factor of 7.4 dB and cable factor of 1.6 dB is added. The amplifier gain of 29 dB is subtracted, giving a field strength of 32 dB μ V/m. This value in dB μ V/m was converted to its corresponding level in μ V/m.

RA = 52.0 dB μ V/m	
AF = 7.4 dB	RR = 23.0 dB μ V
CF = 1.6 dB	LF = 9.0 dB
AG = 29.0 dB	
FS = RR + LF	
FS = 23 + 9 = 32 dB μ V/m	

Level in μ V/m = Common Antilogarithm [(32 dB μ V/m)/20] = 39.8 μ V/m

3.2 Radiated Emission Configuration Photograph - Base Unit

Worst Case Radiated Emission

at 902.300 MHz

For electronic filing, the worst case radiated emission configuration photographs are saved with filename: base1.jpg and base2.jpg

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3.3 Radiated Emission Data - Base Unit

The data on the following pages list the significant emission frequencies, the limit and the margin of compliance.

Judgement : Passed by 4.8 dB

TEST PERSONNEL:

Tester Signature

H. Y. Vu, Engineer
Typed/Printed Name

April 11, 2000
Date

INTERTEK TESTING SERVICES

Company: VTech Communications Limited
Model: VTech 9151
Mode : TX-Channel 1

Date of Test: March 19, 2000

Table 1, Base unit

Radiated Emissions

Polarity	Frequency (M Hz)	Reading (dB μ V)	Antenna Factor (dB)	Pre-Am p Gain (dB)	Net at 3m (dB μ V/m)	Limit (dB μ V/m)	Margin (dB)
V	902.300	82.6	22.6	16	89.2	94	-4.8
H	1804.600	46.0	26.5	34	38.5	54	-15.5
H	*2706.900	45.4	29.1	34	40.5	54	-13.5
H	*3609.200	38.6	32.8	34	37.4	54	-16.6
H	*4511.500	37.1	34.0	34	37.1	54	-16.9

- NOTES:
1. Peak Detector data
 2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
 3. Negative value in the margin column shows emission below limit.
 4. Horn antenna and average detector are used for the emission over 1000MHz.
- * Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak detector data for frequencies below 1000 MHz and average detector data for frequencies over 1000 MHz.

Test Engineer: H. Y. Vu

INTERTEK TESTING SERVICES

Company: VTech Communications Limited
Model: VTech 9151
Mode : TX-Channel 26

Date of Test: March 19, 2000

Table 2, Base unit

Radiated Emissions

Polarity	Frequency (M H z)	Reading (dB μ V)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Net at 3m (dB μ V /m)	Limit (dB μ V /m)	Margin (dB)
V	906.050	82.0	22.6	16	88.6	94	-5.4
H	1812.100	46.4	26.5	34	38.9	54	-15.1
H	*2718.150	45.5	29.1	34	40.6	54	-13.4
H	*3624.200	38.7	32.8	34	37.5	54	-16.5
H	*4530.250	37.1	34.0	34	37.1	54	-16.9

- NOTES:
1. Peak Detector data
 2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
 3. Negative value in the margin column shows emission below limit.
 4. Horn antenna and average detector are used for the emission over 1000MHz.
- * Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak detector data for frequencies below 1000 MHz and average detector data for frequencies over 1000 MHz.

Test Engineer: H. Y. Vu

3.4 Radiated Emission Configuration Photograph - Handset

Worst Case Radiated Emission

at 2783.250 MHz

For electronic filing, the worst case radiated emission configuration photographs are saved with filename: handset1.jpg and handset2.jpg

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3.5 Radiated Emission Data - Handset

The data on the following pages list the significant emission frequencies, the limit and the margin of compliance.

Judgement : Passed by 11.7 dB

TEST PERSONNEL:

Tester Signature

H. Y. Vu, Engineer
Typed/Printed Name

April 11, 2000
Date

INTERTEK TESTING SERVICES

Company: VTech Communications Limited
Model: VTech 9151
Mode : TX-Channel 8

Date of Test: March 19, 2000

Table 3, Handset

Radiated Emissions

Polarity	Frequency (M H z)	Reading (dB μ V)	Antenna Factor (dB)	Pre-A m p Gain (dB)	Net at 3m (dB μ V /m)	L i m i t (dB μ V /m)	M a r g i n (dB)
V	923.100	72.7	22.6	16	79.3	94	-14.7
H	*1846.200	48.7	26.5	34	41.2	54	-12.8
H	*2769.300	45.1	29.1	34	40.2	54	-13.8
H	*3692.400	43.4	32.8	34	42.2	54	-11.8

- NOTES:
1. Peak Detector data
 2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
 3. Negative value in the margin column shows emission below limit.
 4. Horn antenna and average detector are used for the emission over 1000MHz.
- * Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak detector data for frequencies below 1000 MHz and average detector data for frequencies over 1000 MHz.

Test Engineer: H. Y. Vu

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Company: VTech Communications Limited
Model: VTech 9151
Mode : TX-Channel 25

Date of Test: March 19, 2000

Table 4, Handset

Radiated Emissions

Polarity	Frequency (M Hz)	Reading (dB μ V)	Antenna Factor (dB)	Pre-Amp Gain (dB)	Net at 3m (dB μ V /m)	Limit (dB μ V /m)	Margin (dB)
V	927.750	72.5	22.6	16	79.1	94	-14.9
H	*1855.500	47.8	26.5	34	40.3	54	-13.7
H	*2783.250	47.2	29.1	34	42.3	54	-11.7
H	*3711.000	42.0	32.8	34	40.8	54	-13.2

- NOTES:
1. Peak Detector data
 2. All measurements were made at 3 meters. Harmonic emissions not detected at the 3-meter distance were measured at 0.3-meter and an inverse proportional extrapolation was performed to compare the signal level to the 3-meter limit. No other harmonic emissions than those reported were detected at a test distance of 0.3-meter.
 3. Negative value in the margin column shows emission below limit.
 4. Horn antenna and average detector are used for the emission over 1000MHz.
- * Emission within the restricted band meets the requirement of part 15.205. The corresponding limit as per 15.209 is based on Quasi peak detector data for frequencies below 1000 MHz and average detector data for frequencies over 1000 MHz.

Test Engineer: H. Y. Vu

3.6 Radiated Emission on the bandedge

From the following plots, they show that the fundamental emissions are confined in the specified band and they are at least 50 dB below the carrier level at band edge (902 and 928 MHz). It meets the requirement of section 15.249(c).

Emission Plot

For electronic filing, the emission plots are saved with filename: emission.pdf

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3.7 Line Conducted Configuration Photograph - Base Unit

Worst Case Line-Conducted Configuration

at 23.995 MHz

For electronic filing, the worst case line conducted configuration photographs are saved with filename: conduct1.jpg to conduct3.jpg

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3.8 Line Conducted Emission Configuration Data

The data on the following pages list the significant emission frequencies, the limit, and the margin of compliance.

Judgement : Passed by 4.4 dB

TEST PERSONNEL:

Tester Signature

H. Y. Vu, Engineer
Typed/Printed Name

April 11, 2000
Date

INTERTEK TESTING SERVICES

Company: VTech Communications Limited
Model: VTech 9151

Date of Test: March 19, 2000

Conducted Emissions

For electronic filing, the conducted emission test result is saved with filename:
conduct.pdf

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EXHIBIT 4 EQUIPMENT PHOTOGRAPHS

4.0 Equipment Photographs

For electronic filing, the photographs are saved with filename: ophoto1.jpg to ophoto2.jpg & iphoto1.jpg to iphoto11.jpg

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EXHIBIT 5 PRODUCT LABELLING

5.0 **Product Labelling**

For electronic filing, the FCC ID label artwork and location is saved with filename:
label.pdf

**EXHIBIT 6
TECHNICAL SPECIFICATIONS**

6.0 **Technical Specifications**

For electronic filing, the block diagram and circuit diagram are saved with filename: block.pdf and circuit.pdf respectively.

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EXHIBIT 7 INSTRUCTION MANUAL

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7.0 Instruction Manual

For electronic filing, a preliminary copy of the Instruction Manual is saved with filename: manual.pdf

Please note that the required FCC Information to the User can be found on Page 36 of 39 of this manual.

This manual will be provided to the end-user with each unit sold/leased in the United States.

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**EXHIBIT 8
SECURITY CODE INFORMATION**

8.0 Security code information

All data communication over the RF link will include a security code as required by FCC Part 15. When a data packet is received over the RF link, the security code contained in the packet will be verified before any data is processed. This prevents the handset from receiving commands from another base unit and vice-versa.

The handset and base units will use an identical, 16-bit digital security codes. The security code is stored in the non-volatile memory in the base and handset unit and factory defaulted I production. During production, all units will be passed through a test jig in pair. The test jig will test some parameters of the unit pair and write the security code into the memory once all test parameters passed. The test jig will count on the security code (Totally 65536 - 16 bit buffer and reset after the buffer full) and write to the unit pair.