

REGULATORY COMPLIANCE REPORT

TITLE: Test Report for title 47 Part 15.249 and RSS-210 Low Power Devices for 100 American (type 2 permissive change)

AUTHOR: Mark Kvamme

REV	CCO	DESCRIPTION OF CHANGE	DATE	<u>APPROVALS</u>	
001		initial upload		Engineering	
				Regulatory	

REVISION HISTORY

				Engineering	
				Regulatory	
				Engineering	
				Regulatory	
				Engineering	
				Regulatory	

NOTICE OF PROPRIETARY INFORMATION

Information contained herein is proprietary and is property of **ITRON, Inc.** where furnished with a proposal, the recipient shall use it solely to evaluate the proposal. Where furnished to a customer it shall be used solely for the purposes of inspection, installation or maintenance. Where furnished to a supplier, it shall be used solely in the performance of work contracted for this company. The information shall not be used or disclosed by the recipient for any other purpose, whatsoever.

Test Data Summary
FCC Part 15.249 / ISED RSS-210 Annex 2
Field strength of Low Power Transmitters,
500GA American/Rockwell Residential, 908 MHz for EUT
FCC ID: EWQ100GDLAS IC: 864D-100GDLAS ISED HVINS: 1S,2S,8S

Rule	Description	Spec Limit	Max. Reading	Pass/Fail
15.31(e)	Variation of Supply Voltage	n/a	N/A (battery)	N/A
Part 15.207 / RSS-Gen 8.8	Powerline conducted emissions	n/a	N/A (battery)	N/A
15.249(d) / 15.209 RSS Gen 6.13,8.9, 8.10 and RSS 210 A2.9(b)	Out of band non-harmonic radiated emissions	table	None	Pass
15.35(b) / RSS Gen 6.10	duty cycle corrections	calculated	not applied	N/A
15.249(a) / RSS-210 A2.9(a)	Radiated emissions of transmitter fundamental and harmonics	Fundamental : 94 dbuV/m Avg Harmonics : Peak 74 dbuV/m Avg 54 dbuV/m	Fundamental: quasi peak level = 93.11 dbuV/m @ 908MHz Harmonics: Peak level= 53.75 dbuV/m @ 7264 MHz	Pass
15.249(d) / 15.209 RSS-210 A2.9(a) / RSS Gen 6.13, 8.9	Band Edge, radiated	-50dBc or 46 dbuV/m (lesser)	45.15 dbuV/m @ 902 MHz 43.99 dbuV/m @ 928 MHz	Pass
15.215 (c) / RSS Gen 6.6 and RSS 210 A1.1.3	20dB Bandwidth	<0.5% of the center frequency	Not Measured	Pass

Rule versions: FCC Part 1; FCC Part 2; FCC Part 15; RSS-102 Issue 5 (03-2015); RSS-210 Issue 8en (05-2015); RSS 247 Issue 1 (05-2015); RSS-Gen Issue 4 (12-2014).

Reference docs: ANSI C63.4-2003(2009,2014); ANSI C63.10-2003(2009,2013); DA 00-705 (03-30-2000); OET65 (08-1997); OET65C (06-2001); IEEE C95.3-2002.(2003, 2010); RSP100 issue11; SDR KDB 442812 D01 (07-2014); Exposure KDB 227498D01 (02-2014)

Cognizant Personnel	
<u>Mark Kvamme</u> Name	<u>Test Technician</u> Title
<u>Johann De Jager</u> Name	<u>Project Engineer</u> Title
<u>Jay Holcomb</u> Name	<u>Regulatory</u> Title

CONDITIONS DURING TESTING

No Modifications to the EUT were necessary during the testing.

FCC 15.31(m) – ISED n/a ; Number of Channel

This device operates and was tested on one channel.

ANSI C63.4 - Temperature and Humidity During Testing

The temperature during testing was within +10° C and +40° C.

The Relative humidity was between 10% and 90%.

RSS-Gen 4.3 (g): Tests shall be performed at ambient temperature

EQUIPMENT UNDER TEST (EUT) DESCRIPTION

Itron declares that the EUT tested was representative of a production unit.

EQUIPMENT UNDER TEST

EUT Module

Manufacturer:	Itron, Inc.
Itron P/N:	ERG-5006-001,002,003,004
Serial Number(s)	Listed Below
Power source	Fresh Batteries were used

Plot Information

In the zero span measurements, the line in the display is the trigger level.

15.31(e)**Variation of Supply Voltage**

Vary the supply voltage from 85% to 115% of the nominal voltage. If the power level of the fundamental signal varies with supply voltage, record the voltage level at which the fundamental signal is at its highest and use that voltage level for all further testing.

DEVICE IS BATTERY OPERATED NOT CONNECTED TO THE POWER LINE. BATTERY IS NOT RECHARGABLE. THEREFORE THIS TEST IS N/A.

15.207 / RSS-GEN 8.8**Power line Conducted Emissions**

Measure the AC power line conducted emissions from 150kHz to 30 MHz using a 50mH/50ohm line impedance stabilization network (LISN) according to the procedure specified in ANSI C63.4. Verify that no emissions exceed the following limits:

Frequency (MHz)	Quasi-Peak (dBuV)	Average (dBuV)
0.15-0.5	66 to 56*	56 to 46*
0.5-5	56	46
5-30	60	50

*Decreases with the logarithm of frequency

DEVICE IS BATTERY OPERATED NOT CONNECTED TO THE POWER LINE. BATTERY IS NOT RECHARGABLE. THEREFORE THIS TEST IS N/A.

15.249(d) / 15.209 / RSS Gen 6.13, 8.9, 8.10 and RSS 210 A2.9(b)**Out of band non-harmonic emissions**

Except as provided elsewhere in this subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table

Frequency (MHz)	Field Strength (microvolts/meter)	in dBuV/m	Measurement Distance (meters)*
0.009-0.490	2440F (kHz)		300
0.490-1.705	2400F (kHz)		30
1.705-30.0	30	29.5	30
30-88	100	40	3
88-216	150	43.5	3
216-960	200	46	3
Above 960	500	54	3

$$FS (dBuV) = 20 * \log (FS(uV/m))$$

* Adjust when measuring at different distances than specified; 40dB/decade <30MHz and 20dB/decade >=30MHz. (at 30MHz depends on the antenna used)

note: 15.249(e) As shown in §15.35(b), for frequencies above 1000 MHz, the field strength limits in paragraphs (a) and (b) of this section are based on average limits. However, the peak field strength of any emission shall not exceed the maximum permitted average limits specified above by more than 20 dB under any condition of modulation.

Measure the field strength of all spurious emissions that are not harmonics according to the procedure in Appendix A.

For emissions measurements below 30MHz, rotate the loop antenna about its horizontal and vertical positions to maximize emissions.

Frequency range investigated 9kHz to 9.08Ghz
no emissions found

15.35(b)/ RSS Gen 6.10**Pulsed Operation / Duty Cycle Corrections**

Calculate the maximum duty cycle of the transmitter that will occur in any 100ms. Perform the following calculation:

$$\text{Duty Cycle}_{dB} = |20 * \log(\text{Duty Cycle } \%)|$$

$$\text{Duty Cycle}_{dB} = |20 * \log(\mathbf{N/A})|$$

$$\text{Duty Cycle}_{dB} = \mathbf{N/A} \text{ db}$$

Unit tested with a fresh Battery: **N/A**

Duty Cycle Correction was not applied

15.249(a) / RSS-210 Sec. A2.9.(a)

Transmitter Fundamental and Harmonics

(a) Except as provided in paragraph (b) of this section, the field strength of emissions from intentional radiators operated within these frequency bands shall comply with the following: (table below)

(c) Field strength limits are specified at a distance of 3 meters.

(e) As shown in §15.35(b), for frequencies above 1000 MHz, the field strength limits in paragraphs (a) and (b) of this section are based on average limits. However, the peak field strength of any emission shall not exceed the maximum permitted average limits specified above by more than 20 dB under any condition of modulation.

Measure the field strength of the transmitter fundamental and harmonic emissions at three meters according to the procedure in Appendix A. Record emissions levels with the transmitter near its lowest, middle, and highest frequencies. The maximum field strength of emissions may not exceed:

Fundamental (mV/m)	in (dBuV/m)	Harmonics (mV/m)	in (dBuV/m)
50,000	94	500	54

$$FS \text{ (dBuV/m)} = 20 * \log (FS(uV/m))$$

Equipment Used	Serial Number	Cal Date	Due
Agilent E4440A Spectrum Analyzer	MY45305142	4/18/2016	4/18/2017
Emco 6502 Loop (9kHz to 30MHz)	9509-2970	3/3/2016	3/3/2018
Emco 3110B Biconical (30MHz-to 300MHz)	9203-2455	1/10/2017	1/10/2019
Emco 3115 waveguide (1Ghz - 18GHz)	9205-3878	3/7/2016	3/7/2018
EMCO 3146 Log periodic (200MHz to 1GHz)	9203-3358	1/10/2017	1/10/2019
Huber Suhner 40 foot cable	N/A	4/29/2016	4/29/2017
1.3Ghz high pass filter	405734	12/16/2016	12/16/2017
minicircuits ZVA183 (001 and 002)	N/A	12/16/2016	12/16/2017
Microcoax 3 foot cable	N/A	12/16/2016	12/16/2017
Date	Tested by		
February 10, 2017	Mark Kvamme		

Unit tested with a fresh Battery: **15151111**

Frequency Mhz	rbw=120KHz vbw=300KH z	rbw=120 Khz	antenna correctio n factor db/m	cable loss db	amplifie r gain db	rbw=120KHz vbw=300KH z	rbw=120 Khz
	peak Reading dbm	Quasi Peak reading dbm				peak corrected level dbuv/m(3)	Quasi Peak corrected level dbuv/m (4)
908	-36.76	-39.08	22.22	2.97	0	95.43	93.11

(3) Level (dBuV/m)=peak Level (dbm)+107 – Amplifier Gain (db) +Ant. Factor (db/m) + Cable Loss (db)

(4) Level (dBuV/m)=Quasi peak Level (dbm)+107 – Amplifier Gain (db) +Ant. Factor (db/m) + Cable Loss (db)

Frequency Mhz	rbw=1MHz vbw=1MHz peak Reading dbm	rbw=1MHz vbw=10hz Average reading dbm	antenna correction factor db/m	cable loss db	amplifier gain db	rbw=1MHz vbw=1MHz peak corrected level dbuv/m (3)	rbw=1MHz vbw=10hz average corrected level dbuv/m (4)
7264	-52.26	-65.53	36.27	8.74	46	53.75	40.48
9080	-56.76	-68.83	37.91	9.81	44.79	53.17	41.1
3632	-45.62		31.56	6.28	49.3	49.92	
1816	-40.92		26.82	4.39	48.38	48.91	
6356	-55.39		34.6	8.21	46.3	48.12	
5448	-52.95		34	7.66	47.62	48.09	
4540	-50.11		32.26	7.01	49.23	46.93	
2724	-46.88		28.77	5.42	48.78	45.53	
8172	-65		37.02	9.32	45.54	42.8	

(3) Level (dBuV/m) = peak Level (dbm)+107 – Amplifier Gain (db) +Ant. Factor (db/m) + Cable Loss (db)

(4) Level (dBuV/m) = Average Level (dbm)+107 – Amplifier Gain (db) +Ant. Factor (db/m) + Cable Loss (db)

FCC Part 15.249(d) / 15.209 / RSS 2110 A.2.9(a) / RSS GEN 6.13, 8.9

Band Edge, radiated

(d) Emissions radiated outside of the specified frequency bands, except for harmonics, shall be attenuated by at least 50 dB below the level of the fundamental or to the general radiated emission limits in §15.209 (200uV/m(46dbuV/m) at 3 meters), whichever is the lesser attenuation.

Use the following spectrum analyzer settings:

Span = wide enough to capture the peak level of the emission operating on the channel closest to the band edge, as well as any modulation products which fall outside of the authorized band of operation
 RBW $\geq$ 1% of the span
 VBW $\geq$ RBW
 Sweep = auto
 Detector function = peak
 Trace = max hold

Allow the trace to stabilize. Set the marker on the emission at the band edge, or on the highest modulation product outside of the band, if this level is greater than that at the band edge. Enable the marker-delta function, and then use the marker-to-peak function to move the marker to the peak of the in-band emission. The marker-delta value now displayed must comply with the limit specified in this Section. Submit this plot.

Now, using the same instrument settings, enable the hopping function of the EUT. Allow the trace to stabilize. Follow the same procedure listed above to determine if any spurious emissions caused by the hopping function also comply with the specified limit.

Equipment Used	Serial Number	Cal Date	Due
Agilent E4440A Spectrum Analyzer	MY45305142	4/18/2016	4/18/2017
EMCO 3146 Log periodic (200MHz to 1GHz)	9203-3358	1/10/2017	1/10/2019
Huber Suhner 40 foot cable	N/A	4/29/2016	4/29/2017
Date	Tested by		
February 10, 2017	Mark Kvamme		

Frequency Mhz	rbw=120KHz vbw=300KHz z peak Reading dbm	rbw=120 KHz Quasi Peak reading dbm	antenna correction factor db/m	cable loss db	amplifier gain db	rbw=120KHz vbw=300KHz z peak corrected level dbuv/m(3)	rbw=120 KHz Quasi Peak corrected level dbuv/m (4)
908	-36.76	-39.08	22.22	2.97	0	95.43	93.11
902		-86.71	21.9	2.96	0		45.15
928		-88.32	22.3	3.01	0		43.99

(3) Level (dBuV/m)=peak Level (dbm)+107 – Amplifier Gain (db) +Ant. Factor (db/m) + Cable Loss (db)

(4) Level (dBuV/m)=Quasi peak Level (dbm)+107 – Amplifier Gain (db) +Ant. Factor (db/m) + Cable Loss (db)

15.215 (c) / RSS-GEN 6.6 and RSS 210 A1.1.3

20 dB Bandwidth, conducted

The emission bandwidth (x dB) is defined as the frequency range between two points, one above and one below the carrier frequency, at which the spectral density of the emission is attenuated x dB below the maximum in-band spectral density of the modulated signal. Spectral density (power per unit bandwidth) is to be measured with a detector of resolution bandwidth in the range of 1% to 5% of the anticipated emission bandwidth, and a video bandwidth at least 3x the resolution bandwidth.

When the occupied bandwidth limit is not stated in the applicable RSS or reference measurement method, the transmitted signal bandwidth shall be reported as the 99% emission bandwidth, as calculated or measured.

- The transmitter shall be operated at its maximum carrier power measured under normal test conditions.
- The span of the analyzer shall be set to capture all products of the modulation process, including the emission skirts.
- The resolution bandwidth (RBW) shall be in the range of 1% to 5% of the occupied bandwidth (OBW) and video bandwidth (VBW) shall be approximately 3x RBW.

Note: Video averaging is not permitted.
DUT is endpoint 12, battery was new.

Conducted measurements were not affected by antenna change.

Appendix A

Field Strength Measurement Procedure

This test measures the field strength of radiated emissions using a spectrum analyzer and a receiving antenna in accordance with ANSI C63.4-2003. During the test, the EUT is to be placed on a non-conducting support at 80 cm above the horizontal ground plane of the OATS. The horizontal distance between the antenna and the EUT is to be exactly 3 meters. The bandwidths used shall be per ANSI C63.4-2003; 200 Hz from 9 kHz to 150 kHz, 9 kHz from 150 kHz to 30 MHz, 100 kHz from 30 MHz to 1000 MHz, and 1 MHz from 1 GHz to 40 GHz, with the detector set to peak hold or quasi peak .

- 1) The antenna correction factor, preamplifier gain (if the preamplifier is installed), and cable loss are stored in tables in the EMC analyzer and the level at the analyzer is the corrected level in dbuV/m.
- 2) Monitor the frequency range of interest at a fixed antenna height and EUT azimuth.
- 3) If appropriate, manipulate the system cables to produce the highest amplitude signal relative to the limit. Note the amplitude and frequency of the suspect signal.
- 4) Rotate the EUT 360° to maximize the suspected highest amplitude signal. If the signal or another at a different frequency is observed to exceed the previously noted highest amplitude signal by 1 dB or more, go back to the azimuth and repeat step 3). Otherwise, orient the EUT azimuth to repeat the highest amplitude observation and proceed.
- 5) Move the antenna over its fully allowed range of travel to maximize the suspected highest amplitude signal. If the signal or another at a different frequency is observed to exceed the previously noted highest amplitude signal by 1 dB or more, return to step 3) with the antenna fixed at this height. Otherwise, move the antenna to the height that repeats the highest amplitude observation and proceed.
- 6) Change the polarity of the antenna and repeat step 3), step 4), and step 5). Compare the resulting suspected highest amplitude signal with that found for the other polarity. Select and note the higher of the two signals.
- 7) The final maximized level displayed on the EMC analyzer is the field strength.

