



FCC / ISED Test Report

FOR:

Garmin International, Inc.

Model Name:

A03949

Product Description:

Digital transmission system transceiver

FCC ID: IPH-03949

IC ID: 1792A-03949

Applied Rules and Standards:

47 CFR Part 15.247 (DTS)

RSS-247 Issue 2 (DTS) & RSS-Gen Issue 5

REPORT #: EMC_GARMI-077-20001_15.247_BT_DTS_R1

DATE: 2020-11-19



A2LA Accredited

IC recognized #
3462B-2

CABID: US0187

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1 Assessment

The following device was evaluated against the applicable criteria specified in FCC rules Parts 15.247 of Title 47 of the Code of Federal Regulations and the relevant ISED Canada standard RSS-247.

No deviations were ascertained.

Company	Description	Model #
Garmin International, Inc.	Digital transmission system transceiver	A03949

Responsible for Testing Laboratory:

2020-11-19	Compliance	Cindy Li (EMC Lab Manager)	 Digitally signed by Cindy Li DN: CN = Cindy Li, email = Cindy.Li@cetecom.com Reason: I have reviewed this document Location: your signing location here Date: 2020-11-19 12:57:42 Foxit Reader Version: 10.0.1
Date	Section	Name	Signature

Responsible for the Report:

2020-11-19	Compliance	Yuchan Lu (Test Engineer)	 Digitally signed by: Yuchan Lu DN: CN = Yuchan Lu, email = Yuchan.Lu@cetecom.com, C = US, O = CETECOM Inc. OU = EMC Date: 2020.11.19 12:05:52 - 08'00'
Date	Section	Name	Signature

The test results of this test report relate exclusively to the test item specified in Section 3.
 CETECOM Inc. USA does not assume responsibility for any conclusions and generalizations drawn from the test results with regard to other specimens or samples of the type of the equipment represented by the test item. The test report may only be reproduced or published in full. Reproduction or publication of extracts from the report requires the prior written approval of CETECOM Inc. USA.

2 Administrative Data

2.1 Identification of the Testing Laboratory Issuing the EMC Test Report

Company Name:	CETECOM Inc.
Department:	Compliance
Street Address:	411 Dixon Landing Road
City/Zip Code	Milpitas, CA 95035
Country	USA
Telephone:	+1 (408) 586 6200
Fax:	+1 (408) 586 6299
EMC Lab Manager:	Cindy Li
Responsible Project Leader:	Sangeetha Sivaraman

2.2 Identification of the Client

Client's Name:	Garmin International, Inc.
Street Address:	1200 East 151st Street
City/Zip Code:	Olathe, KS 66062
Country:	USA

2.3 Identification of the Manufacturer

Manufacturer's Name:	Garmin Corporation
Manufacturers Address:	No. 68, Zhangshu 2nd Rd., Xizhi Dist.,
City/Zip Code	New Taipei City 221,
Country	TAIWAN, R.O.C.

3 Equipment Under Test (EUT)

3.1 EUT Specifications

Model No:	A03949
HW Version :	1
SW Version :	1.13
FCC-ID:	IPH-03949
IC-ID:	1792A-03949
HVIN:	A03949
PMN:	N/A
Product Description:	Digital transmission system transceiver
Frequency Range / number of channels:	Manufacture: Cypress Module name/number: BCM20719 Nominal band: 2400 MHz – 2483.5 MHz; Center to center: 2402 MHz (ch 0) – 2480 MHz (ch 39), 40 channels
Type(s) of Modulation:	Bluetooth Low Energy, using Dynamic Sequence Spread Spectrum with GFSK modulation.
Modes of Operation:	Bluetooth LE in both advertising and connected mode of operation
Antenna Information as declared:	1.6 dBi
Max. Peak Output Power:	Conducted Power 2.45 dBm
Power Supply/ Rated Operating Voltage Range:	Vmin: 3.5 VDC/ Vnom: 3.9 VDC / Vmax: 4.35 VDC
Operating Temperature Range:	Low -20°C, Nominal 25°C, High 60°C
Other Radios included in the device:	❖ <u>LTE</u> • Manufacture: Murata • Module name/number: LBAD0XX1SC • FCC ID: HSW-TY1SC • IC ID: 4492A-TY1SC ❖ <u>WLAN</u> • Manufacture: Microchip • Module name/number: ATWILC1000 ❖ <u>Classic BT, ANT</u> • Manufacture: Cypress

	- Module name/number: BCM20719 ❖ <u>NFC</u> - Manufacture: NXP - Module name/number: SN100T ❖ <u>GNSS/GPS</u> - Manufacture: Garmin proprietary
Sample Revision:	☐ Prototype Unit; ☐ Production Unit; ☒ Pre-Production

3.2 EUT Sample details

EUT #	Sample Number	HW Version	SW Version	Notes/Comments
1	3340894753	1	1.13	Radiated Emissions
2	340894642	1	1.13	Conducted RF

3.3 Accessory Equipment details

AE #	Type	Model	Manufacturer	Serial Number
1	Charging USB Cable	-	-	-

3.4 Support Equipment

SE #	Description
1	AC/DC Converter, Manufacture: PHIHONG, Model: PSAI05R-050Q
2	Laptop, Dell Latitude 7490

3.5 Test Sample Configuration

EUT Set-up #	Combination of AE used for test set up	Comments
1	EUT#1 + AE#1	Special commands through command window used to configure the Bluetooth LE radio to low, mid and high channels and co-transmitting with LTE CAT M1 Band 4 mid Channel (1732.5 MHz) provided by the client that will not be available to the end user. For radiated measurements, the internal antenna was connected.
2	EUT#2 + AE#1	Special commands through command window used to configure the Bluetooth LE radio to low, mid and high channel provided by the client that will not be available to the end user. For conducted measurements, the equipment was connected to 50 ohm RF port of the EUT.

3.6 Justification for Worst Case Mode of Operation

During the testing process, the EUT was tested with transmitter sets on low, mid and high channels, and co-transmitting with LTE CAT M1 Band 4 mid Channel (1732.5 MHz). Based on client declaration, the EUT was configured to the highest duty cycle and maximum output power.

For radiated measurements, all data in this report shows the worst case between horizontal and vertical antenna polarizations and for all orientations of the EUT.

4 Subject of Investigation

The objective of the measurements done by CETECOM Inc. was to assess the performance of the EUT according to the relevant requirements specified in FCC rules Part 15.247 of Title 47 of the Code of Federal Regulations and Radio Standard Specification RSS-247 of ISSED Canada.

Testing procedures are based on 558074 D01 DTS Meas Guidance v05r02 – “GUIDANCE FOR PERFORMING COMPLIANCE MEASUREMENTS ON DIGITAL TRANSMISSION SYSTEMS (DTS) OPERATING UNDER SECTION 15.247” - April 2, 2019, by the Federal Communications Commission, Office of Engineering and Technology, Laboratory Division.

5 Measurement Results Summary

Test Specification	Test Case	Temperature and Voltage Conditions	Mode	Pass	NA	NP	Result
§15.247(a)(1) RSS-247 5.2(1)	Emission Bandwidth	Nominal	BTLE	■	□	□	Complies
§15.247(e) RSS-247 5.2(2)	Power Spectral Density	Nominal	BTLE	■	□	□	Complies
§15.247(b)(1) RSS-247 5.4(4)	Maximum Conducted Output Power and EIRP	Nominal	BTLE	■	□	□	Complies
§15.247(d) RSS-247 5.5	Band edge compliance Unrestricted Band Edges	Nominal	BTLE	■	□	□	Complies
§15.247; 15.209; 15.205 RSS-Gen 8.9; 8.10	Band edge compliance Restricted Band Edges	Nominal	BTLE	■	□	□	Complies
§15.247(d); §15.209 RSS-Gen 6.13	TX Spurious emissions- Radiated	Nominal	BTLE	■	□	□	Complies
§15.207(a) RSS Gen 8.8	AC Conducted Emissions	Nominal	BTLE	■	□	□	Complies

Note1: NA= Not Applicable; NP= Not Performed.

6 Measurement Uncertainty

Where relevant, the following measurement uncertainty levels have been estimated for tests performed on the apparatus, with 95% confidence interval (in dB delta to result), based on a coverage factor $k=1$.

Radiated measurement

9 kHz to 30 MHz	± 2.5 dB (Magnetic Loop Antenna)
30 MHz to 1000 MHz	± 2.0 dB (Biconilog Antenna)
1 GHz to 40 GHz	± 2.3 dB (Horn Antenna)

Conducted measurement

150 kHz to 30 MHz	± 0.7 dB (LISN)
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RF conducted measurement	± 0.5 dB
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According to TR 102 273 a multiplicative propagation of error is assumed for RF measurement systems. For this reason the RMS method is applied to dB values and not to linear values as appropriate for additive propagation of error. Also used: <http://physics.nist.gov/cuu/Uncertainty/typeb.html>. The above calculated uncertainties apply to direct application of the Substitution method. The Substitution method is always used when the EUT comes closer than 3 dB to the limit.

6.1 Environmental Conditions during Testing:

The following environmental conditions were maintained during the course of testing:

- Ambient Temperature: 20-25° C
- Relative humidity: 40-60%

6.2 Dates of Testing:

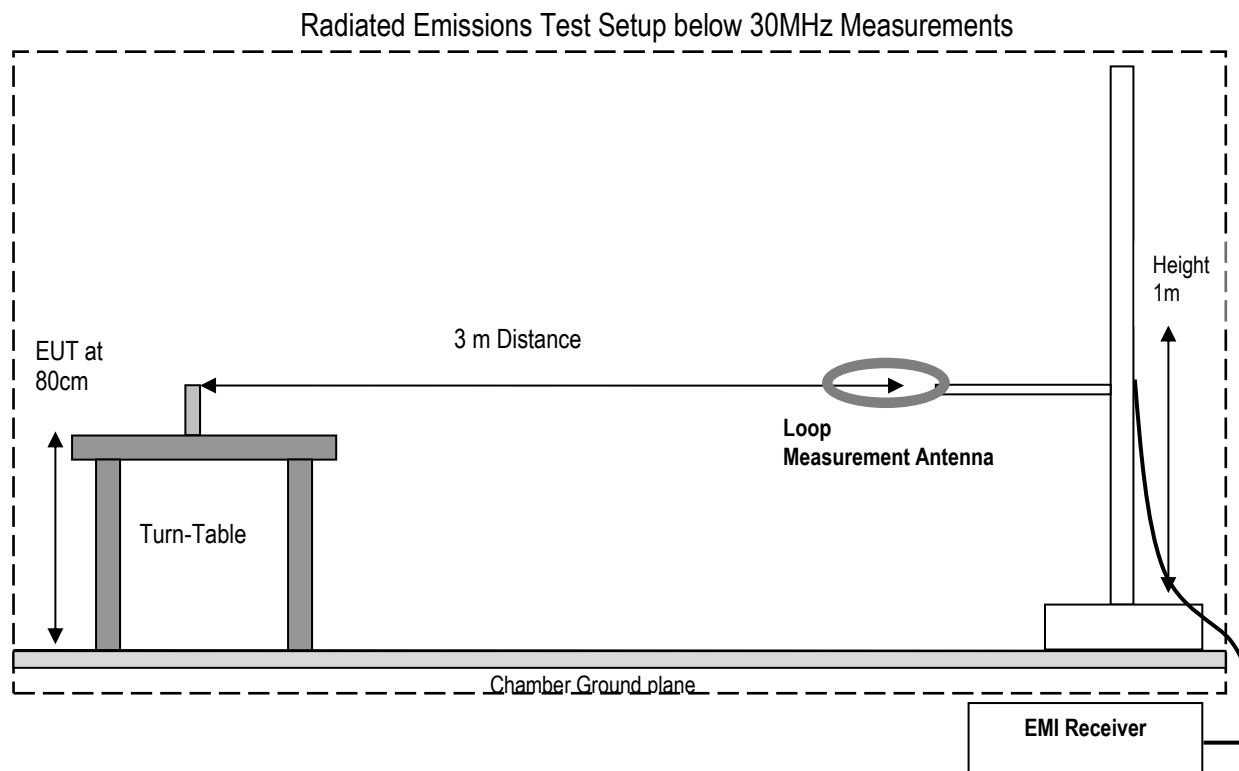
08/31/2020-09/10/2020

7 Measurement Procedures

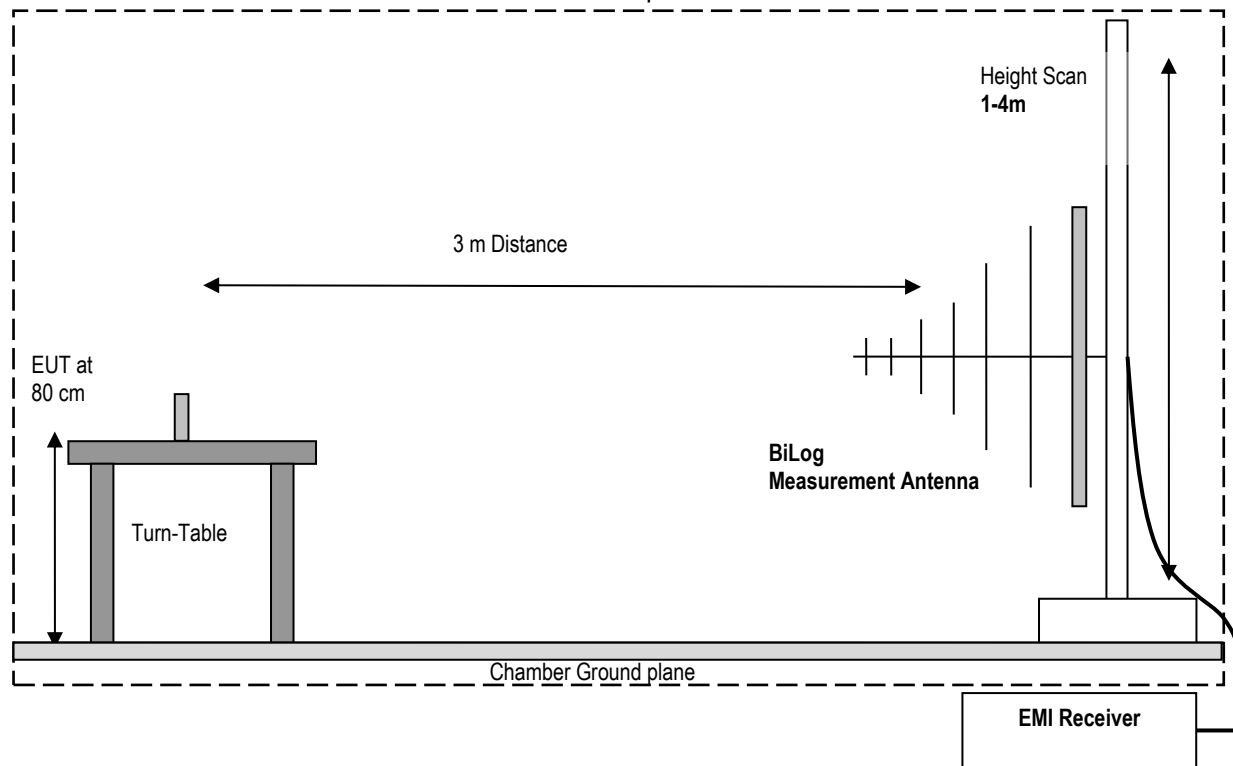
7.1 Radiated Measurement

The radiated measurement is performed according to ANSI C63.10 (2013)

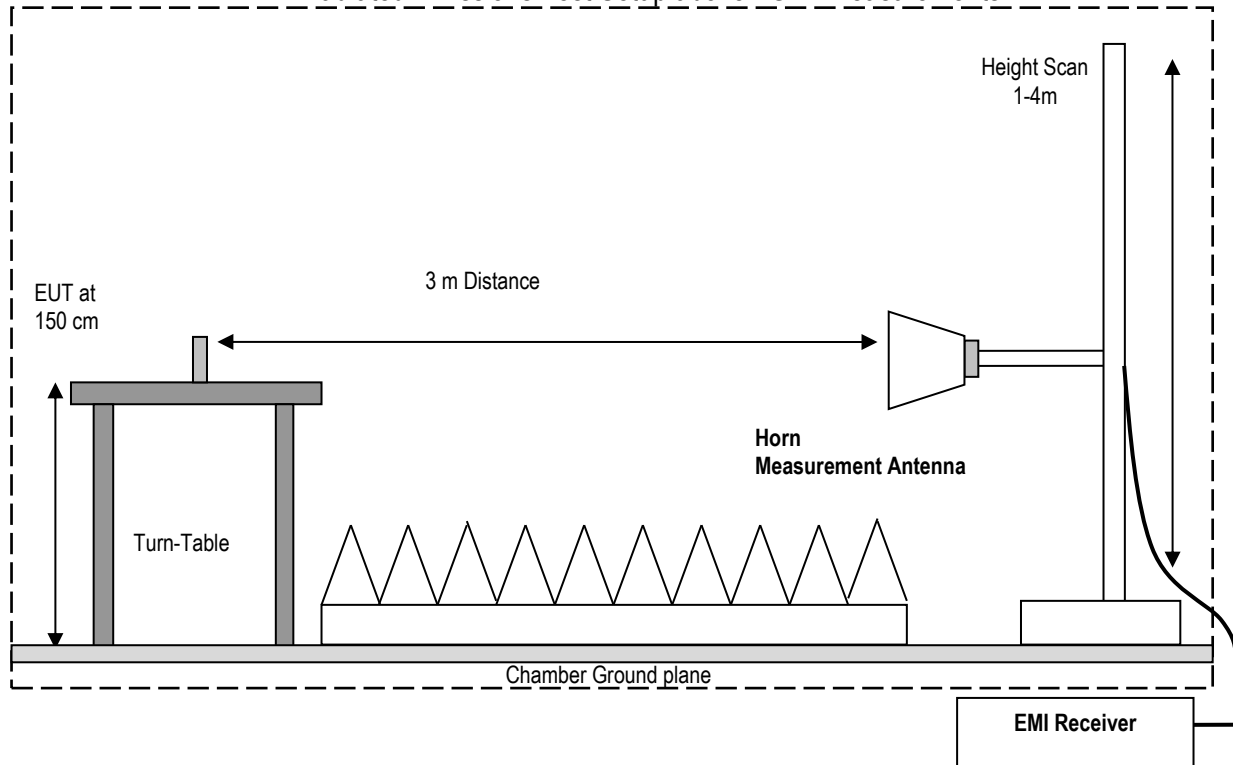
- The exploratory measurement is accomplished by running a matrix of 16 sweeps over the required frequency range with R&S Test-SW EMC32 for 4 positions of the turntable, two orthogonal positions of the EUT and both antenna polarizations. This procedure exceeds the requirement of the above standards to cover the 3 orthogonal axis of the EUT. A max peak detector is utilized during the exploratory measurement. The Test-SW creates an overall maximum trace for all 12 sweeps and saves the settings for each point of this trace. The maximum trace is part of the test report.
- The 10 highest emissions are selected with an automatic algorithm of EMC32 searching for peaks in the noise floor and ensuring that broadband signals are not selected multiple times.
- The maxima are then put through the final measurement and again maximized in a 90deg range of the turntable, fine search in frequency domain and height scan between 1m and 4m.
- The above procedure is repeated for all possible ways of power supply to EUT and for all supported modulations.
- In case there are no emissions above noise floor level only the maximum trace is reported as described above.
- The results are split up into up to 4 frequency ranges due to antenna bandwidth restrictions. A magnetic loop is used from 9 kHz to 30 MHz, a Biconilog antenna is used from 30 MHz to 1 GHz, and two different horn antennas are used to cover frequencies up to 40 GHz.



Radiated Emissions Test Setup 30MHz-1GHz Measurements



Radiated Emissions Test Setup above 1GHz Measurements



7.1.1 Sample Calculations for Field Strength Measurements

Field Strength is calculated from the Spectrum Analyzer/ Receiver readings, taking into account the following parameters:

1. Measured reading in dB μ V
2. Cable Loss between the receiving antenna and SA in dB and
3. Antenna Factor in dB/m

All radiated measurement plots in this report are taken from a test SW that calculates the Field Strength based on the following equation:

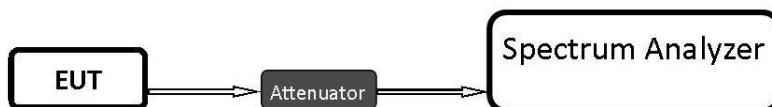
$$FS \text{ (dB}\mu\text{V/m)} = \text{Measured Value on SA (dB}\mu\text{V)} + \text{Cable Loss (dB)} + \text{Antenna Factor (dB/m)}$$

Example:

Frequency (MHz)	Measured SA (dB μ V)	Cable Loss (dB)	Antenna Factor Correction (dB)	Field Strength Result (dB μ V/m)
1000	80.5	3.5	14	98.0

7.2 RF Conducted Measurement Procedure

Testing procedures are based on 558074 D01 DTS Meas Guidance v05r02 – “GUIDANCE FOR PERFORMING COMPLIANCE MEASUREMENTS ON DIGITAL TRANSMISSION SYSTEMS (DTS) OPERATING UNDER SECTION 15.247” - April 2, 2019, by the Federal Communications Commission, Office of Engineering and Technology, Laboratory Division.



- Connect the equipment as shown in the above diagram.
- Adjust the settings of the SA (Rohde-Schwarz Spectrum Analyzer) to connect the EUT at the required mode of test.
- Measurements are to be performed with the EUT set to the low, middle and high channels and for worst case modulation schemes.
- Calculate the conducted power by taking into account attenuation of the cable and the attenuator

8 Test Result Data

8.1 Maximum Peak Conducted Output Power

8.1.1 Measurement according to FCC 558074 D01 DTS Meas Guidance v05r02

Spectrum Analyzer settings:

- RBW $\geq$ DTS bandwidth
- VBW $\geq 3 \times$ RBW
- Span $\geq 3 \times$ RBW
- Sweep = Auto couple
- Detector function = Peak
- Trace = Max hold
- Use peak marker function to determine the peak amplitude level

8.1.2 Limits:

Maximum Peak Output Power:

- FCC §15.247 (b)(1): 1 W
- IC RSS-247: 1 W

8.1.3 Test conditions and setup:

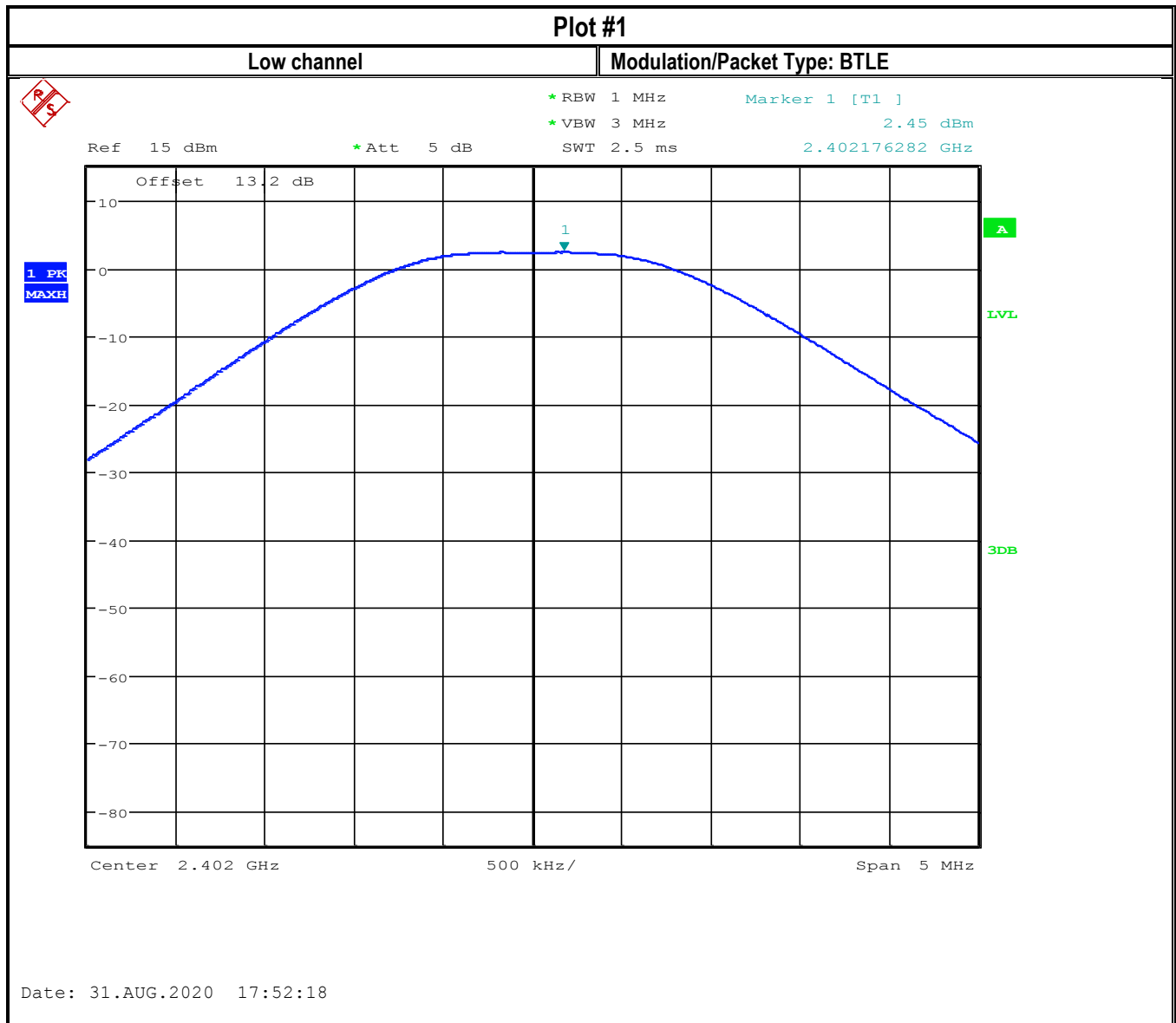
Ambient Temperature	EUT Set-Up #	EUT operating mode	Power Input	Antenna Gain
22° C	2	GFSK continuous fixed channel	110 VAC	1.6 dBi

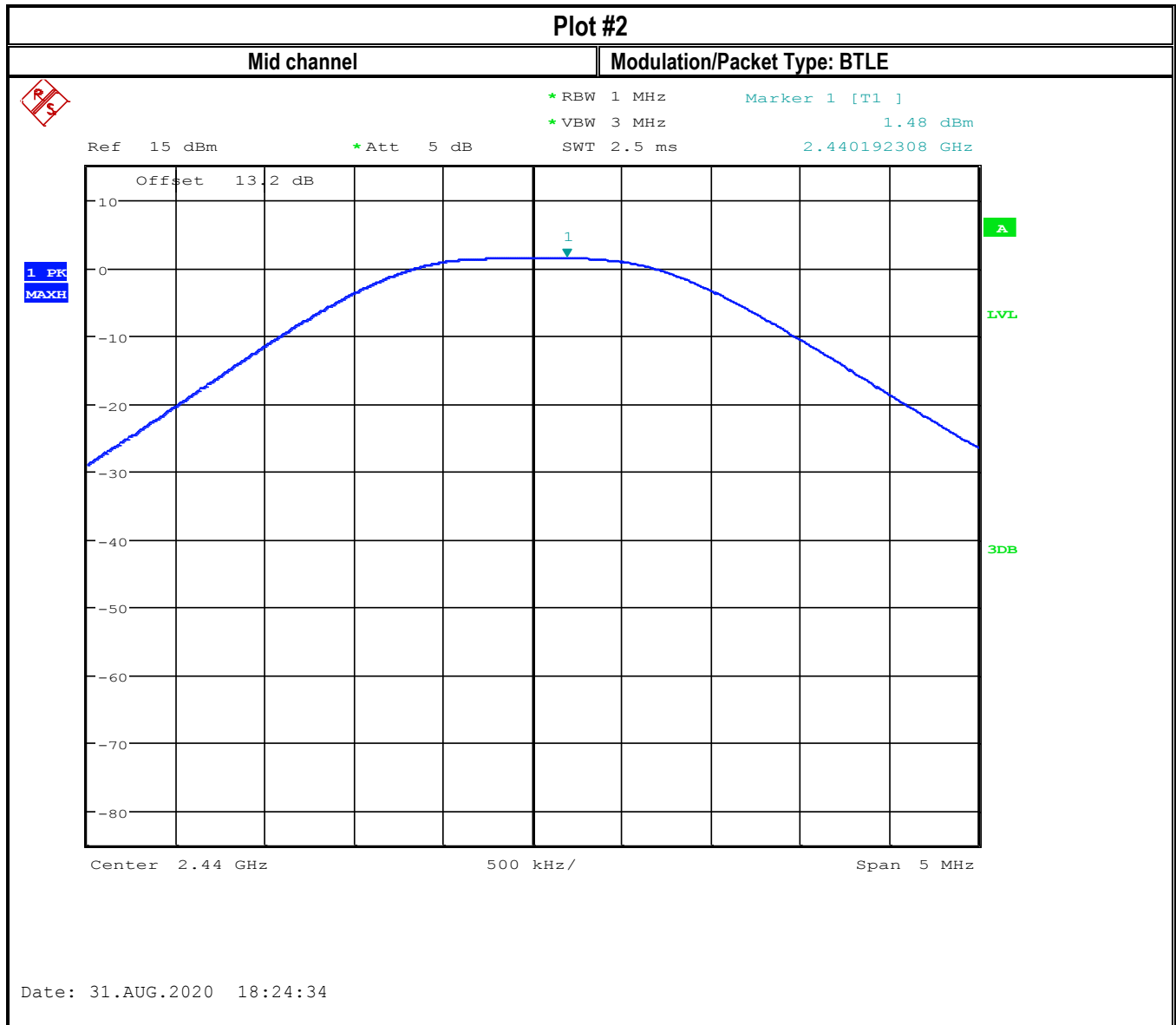
8.1.4 Measurement result:

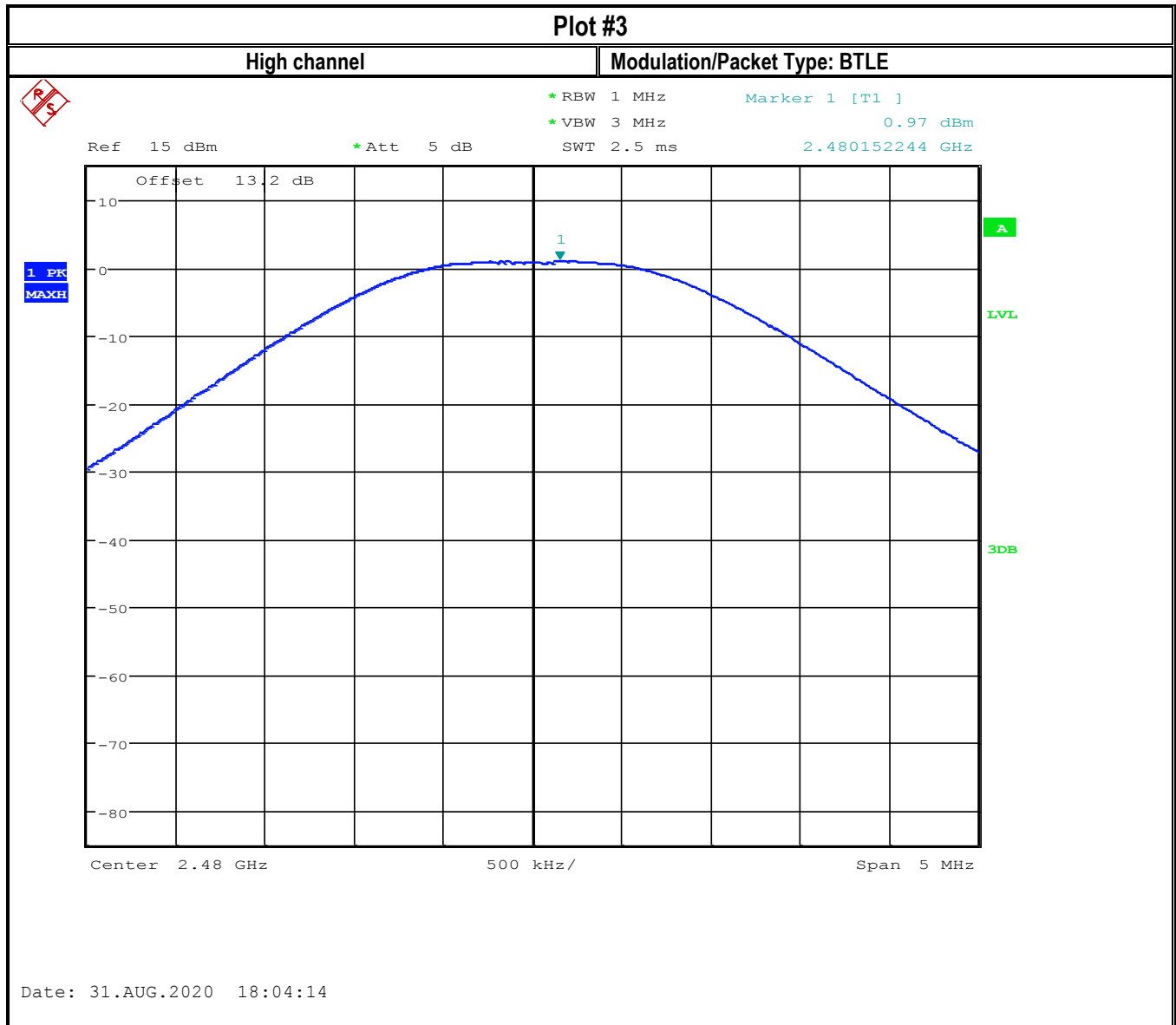
Attenuation of cable and attenuator (already taken into account): 13.2 dB

Plot #	Frequency (MHz)	Maximum Peak Conducted Output Power (dBm)	EIRP (dBm)	Limit (dBm)	Result
1	2402	2.45	4.05	30 (Pk) / 36 (EIRP)	Pass
2	2442	1.48	3.08	30 (Pk) / 36 (EIRP)	Pass
3	2480	0.97	2.57	30 (Pk) / 36 (EIRP)	Pass

8.1.5 Measurement Plots:







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8.2 Power Spectral Density

8.2.1 Measurement according to FCC 558074 D01 DTS Meas Guidance v05r02

Spectrum Analyzer settings for Peak PSD method:

- Set analyzer center frequency to DTS channel center frequency
- Set the span to 1.5 x DTS bandwidth
- Set RBW to: $3 \text{ kHz} \leq \text{RBW} \leq 100 \text{ kHz}$
- Set the VBW $\geq 3 \times \text{RBW}$
- Detector = Peak
- Sweep time = Auto couple
- Trace mode = Max hold
- Allow trace to fully stabilize
- Use the peak marker function to determine the maximum amplitude level within the RBW
- If measured value exceeds limit, reduce RBW (no less than 3 kHz) and repeat

8.2.2 Limits:

FCC§15.247(e) & RSS-247 5.2(2)

- For digitally modulated systems, the peak power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission.

8.2.3 Test conditions and setup:

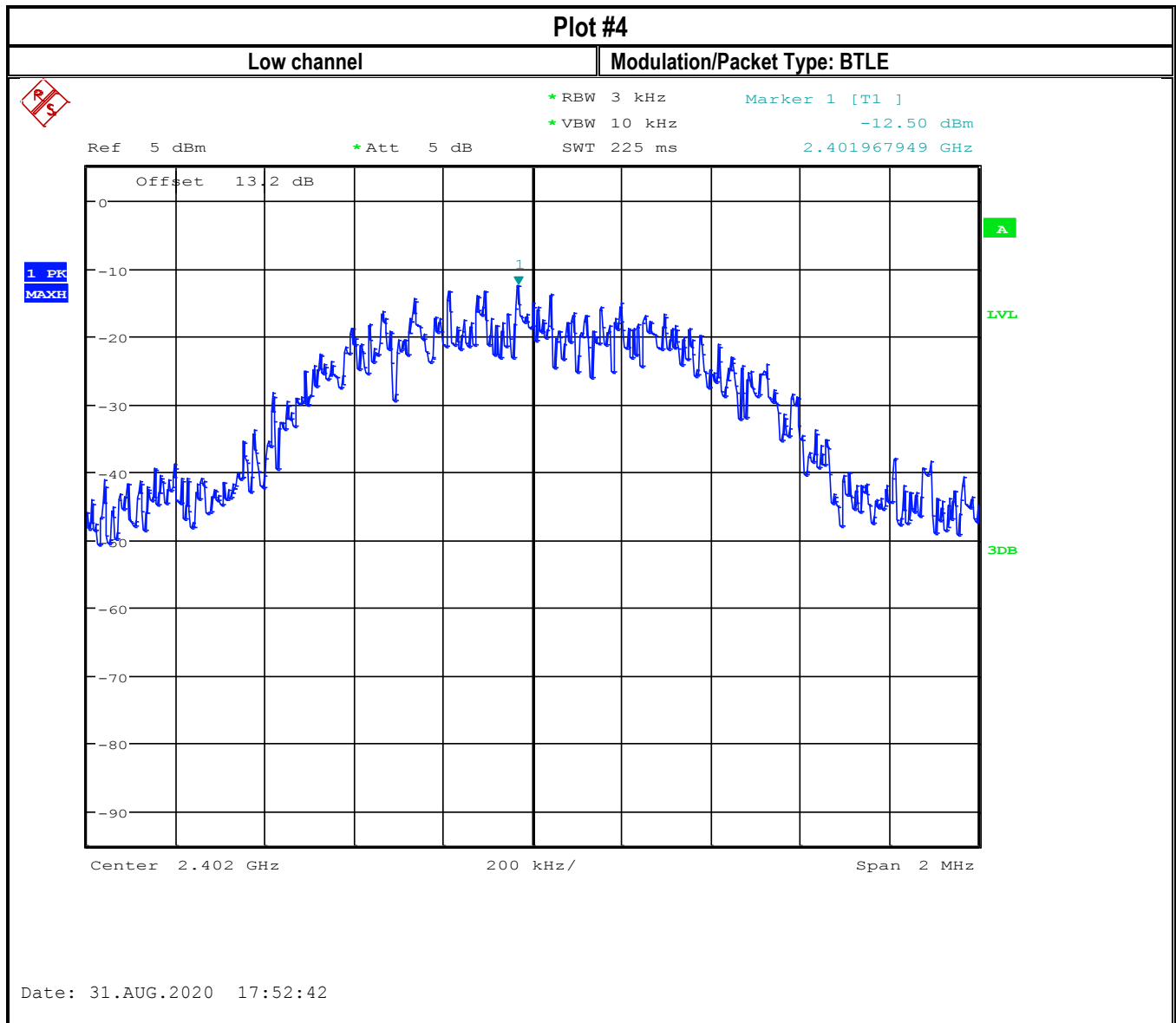
Ambient Temperature	EUT Set-Up #	EUT operating mode	Power Input	Antenna Gain
23° C	2	GFSK continuous fixed channel	110 VAC	1.6 dBi

8.2.4 Measurement result:

Attenuation of cable and attenuator (already taken into account): 13.2 dB

Plot #	Frequency (MHz)	Maximum Power Spectral Density (dBm/3 kHz)	PSD Adjusted for Antenna Gain (dBm/3 kHz)	Limit (dBm / 3 kHz)	Result
4	2402	-12.50	-10.90	8	Pass
5	2442	-13.41	-11.81	8	Pass
6	2480	-14.05	-12.45	8	Pass

8.2.5 Measurement Plots:



Plot #5

Mid channel

Modulation/Packet Type: BTLE



*RBW 3 kHz
*VBW 10 kHz
SWT 225 ms

Marker 1 [T1]

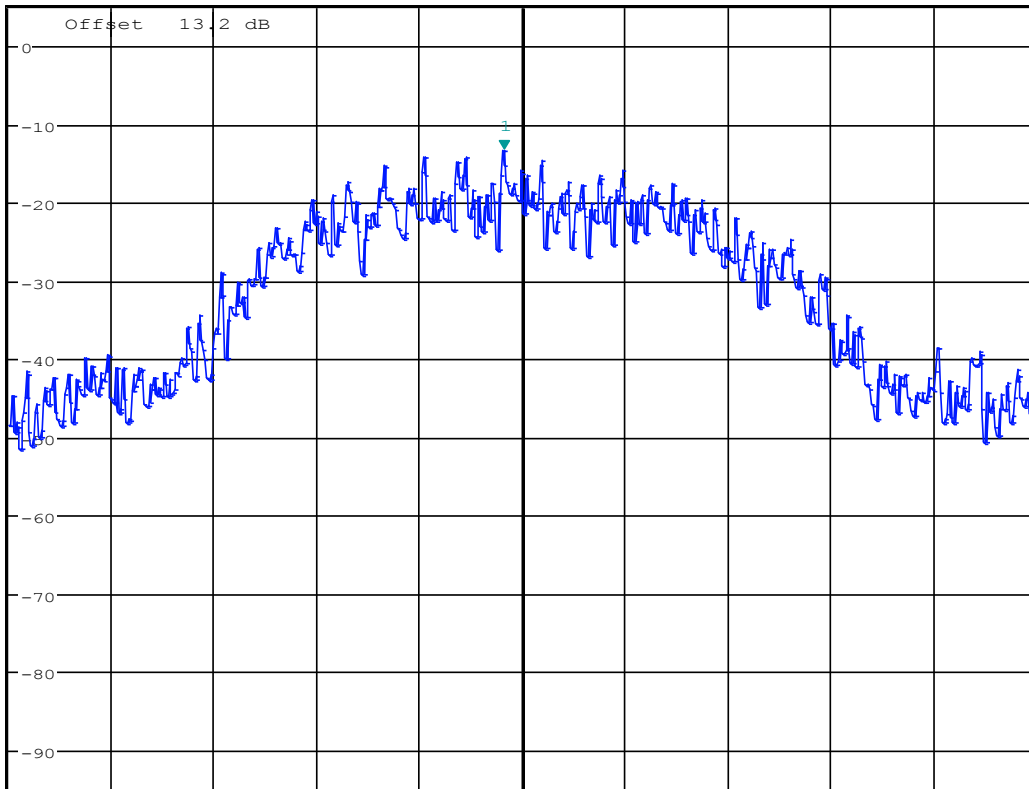
-13.41 dBm

2.439964744 GHz

Ref 5 dBm

*Att 5 dB

1 PK
MAXH



Center 2.44 GHz

200 kHz/

Span 2 MHz

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Plot #6

High channel

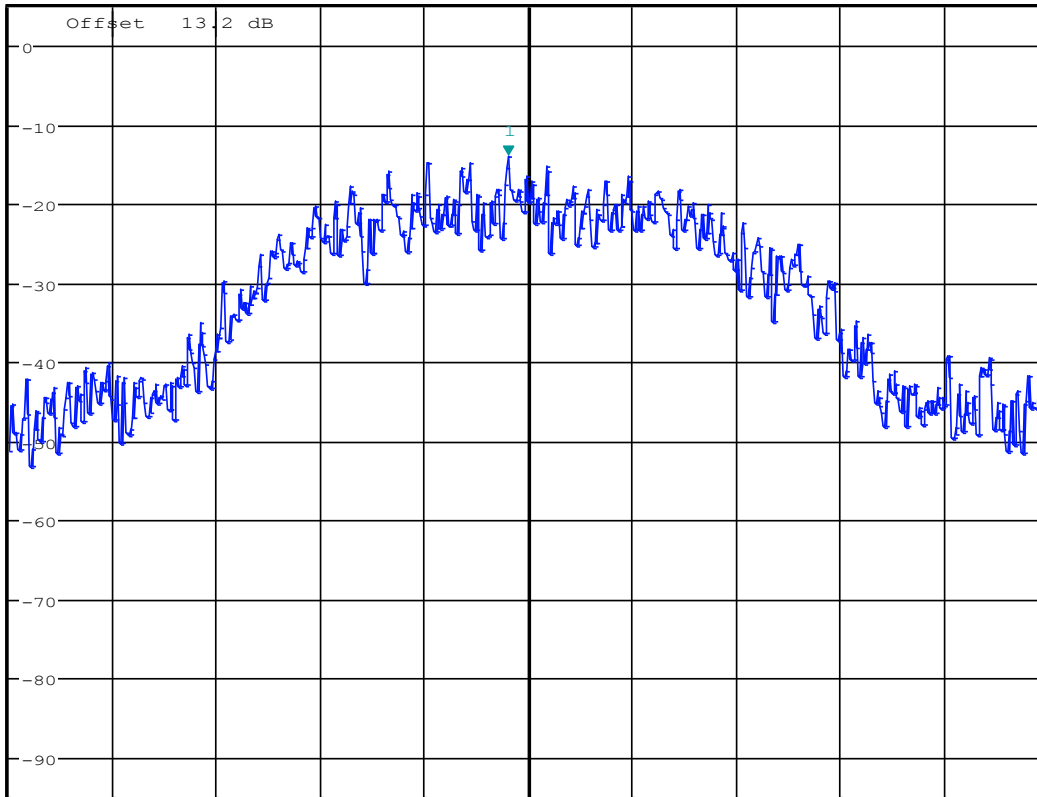
Modulation/Packet Type: BTLE



*RBW 3 kHz
*VBW 10 kHz
SWT 225 ms
Marker 1 [T1]
-14.05 dBm
2.479961538 GHz

Ref 5 dBm

*Att 5 dB



Offset 13.2 dB

Center 2.48 GHz

200 kHz/

Span 2 MHz

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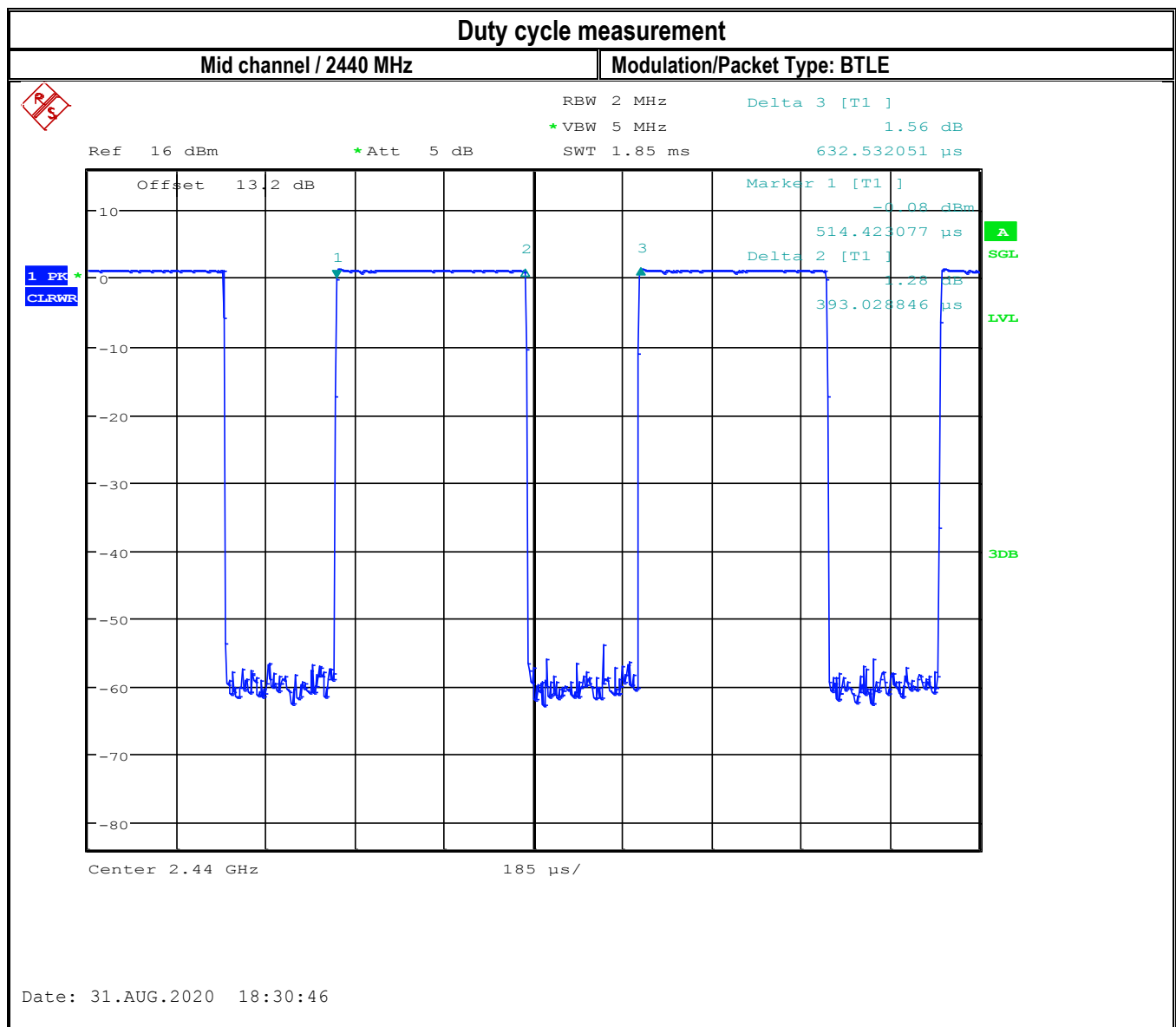
8.3 Duty cycle

8.3.1 Measurement according to FCC 558074 D01 DTS Meas Guidance v05r02

Spectrum Analyzer settings:

- Set the center frequency and of the instrument to the center frequency of the transmission
- Zero span
- Set RBW $\geq$ OBW if possible; otherwise, set RBW to the largest available value
- Detector = Peak or average

8.3.2 Measurement result



Duty cycle = 62.14%

Duty cycle correction factor = $10 \cdot \log(1/0.6214) = 2.07$ dB

8.4 Band Edge Compliance

8.4.1 Measurement according to FCC 558074 D01 DTS Meas Guidance v05r02

Spectrum Analyzer settings for band edge:

- Set the center frequency and span to encompass frequency range to be measured
- RBW = 100 kHz
- VBW $\geq 3 \times$ RBW
- Sweep Time: Auto couple
- Detector = Peak
- Trace = Max hold
- Allow trace to fully stabilize
- Use the peak marker function to determine the maximum amplitude level
- 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

8.4.2 Limits non restricted band:

FCC§15.247 (d)

- In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c)).

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- In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30dB instead of 20dB.

Spectrum Analyzer settings for restricted band:

- Peak measurements are made using a peak detector and RBW=1 MHz

8.4.3 Limits restricted band §15.247/15.209/15.205 and RSS-Gen 8.9/8.10

- *PEAK LIMIT= 74 dB μ V/m @3m =-21.23 dBm
 - *AVG LIMIT= 54 dB μ V/m @3m =-41.23 dBm
 - Start frequency & stop frequency according to frequency range specified in the restricted band table in FCC section 15.205 & RSS-Gen 8.10
 - Measurements with a peak detector were used to show compliance to average limits, thus showing compliance to both peak and average limits.
- (a) Except as shown in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

(b)

MHz	MHz	MHz	GHz
0.090-0.110	16.42-16.423	399.9-410	4.5-5.15
10.495-0.505	16.69475-16.69525	608-614	5.35-5.46
2.1735-2.1905	16.80425-16.80475	960-1240	7.25-7.75
4.125-4.128	25.5-25.67	1300-1427	8.025-8.5
4.17725-4.17775	37.5-38.25	1435-1626.5	9.0-9.2
4.20725-4.20775	73-74.6	1645.5-1646.5	9.3-9.5
6.215-6.218	74.8-75.2	1660-1710	10.6-12.7
6.26775-6.26825	108-121.94	1718.8-1722.2	13.25-13.4
6.31175-6.31225	123-138	2200-2300	14.47-14.5
8.291-8.294	149.9-150.05	2310-2390	15.35-16.2
8.362-8.366	156.52475-156.52525	2483.5-2500	17.7-21.4
8.37625-8.38675	156.7-156.9	2690-2900	22.01-23.12
8.41425-8.41475	162.0125-167.17	3260-3267	23.6-24.0
12.29-12.293	167.72-173.2	3332-3339	31.2-31.8
12.51975-12.52025	240-285	3345.8-3358	36.43-36.5
12.57675-12.57725	322-335.4	3600-4400	Above 38.6
13.36-13.41			

8.4.4 Test conditions and setup:

Ambient Temperature	EUT Set-Up #	EUT operating mode	Power Input	Antenna Gain
22° C	2	GFSK continuous fixed channel	110 VAC	1.6 dBi

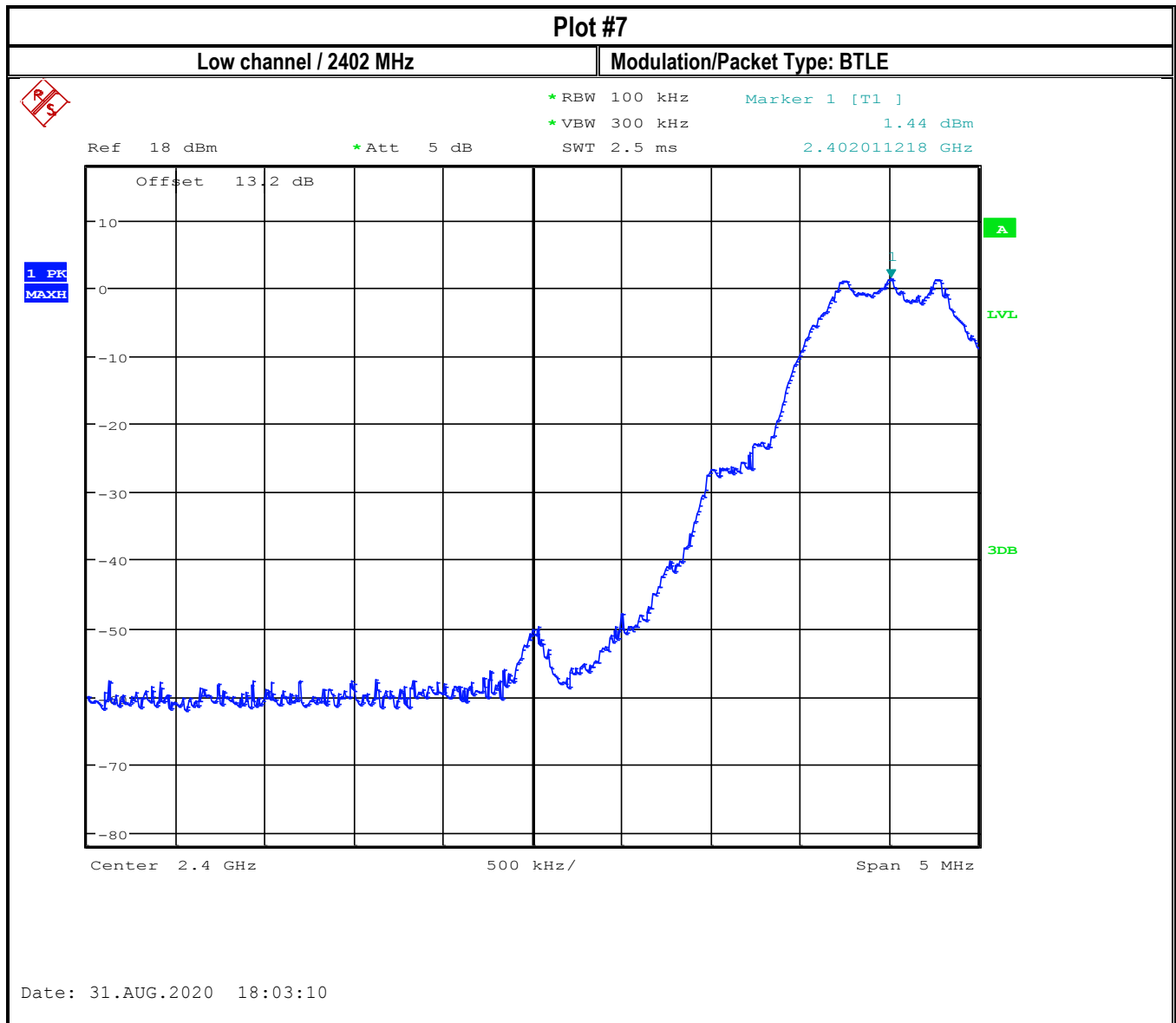
8.4.5 Measurement result:

Plot #	EUT operating mode	Band Edge	Band Edge Delta (dBc)	Limit (dBc)	Result
7, 8	GFSK continuous fixed channel	Lower, Non-restricted	-50.79	-20	Pass

Plot #	EUT operating mode	Band Edge	Measured Peak Value (dBm)	Corrected by duty cycle	Corrected by Antenna Gain (dBm)	Limit (dBm)	Result
9	GFSK continuous fixed channel	Upper Restricted peak	-40.31	NA	-38.71	-21.23 Peak	Pass
10	GFSK continuous fixed channel	Upper Restricted Average	-59.70	-57.63	-56.03	-41.23 AVG	Pass

Note: According to ANSI C63.10 §11.12.2.6, if Antenna Gain is less than 2 dBi, then 2 dBi should be used to determine the EIRP.

8.4.6 Measurement Plots:



Plot #8

Low channel / 2402 MHz

Modulation/Packet Type: BTLE

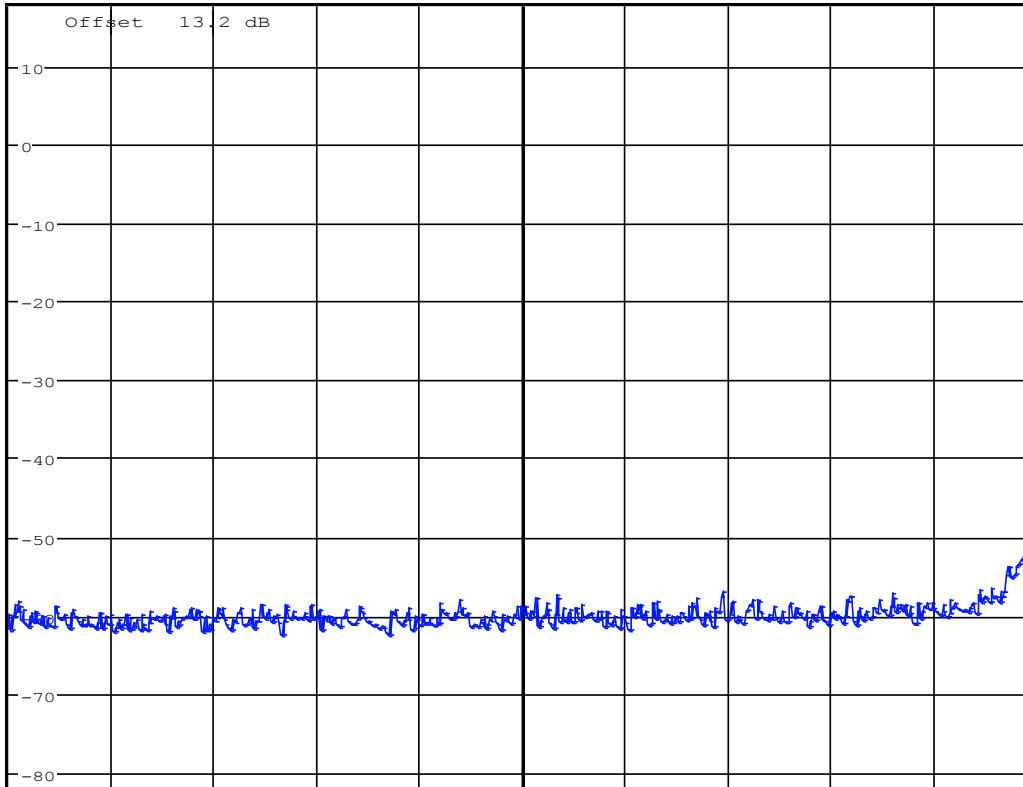


*RBW 100 kHz Marker 1 [T1]
*VBW 300 kHz -49.35 dBm
SWT 2.5 ms 2.399995192 GHz

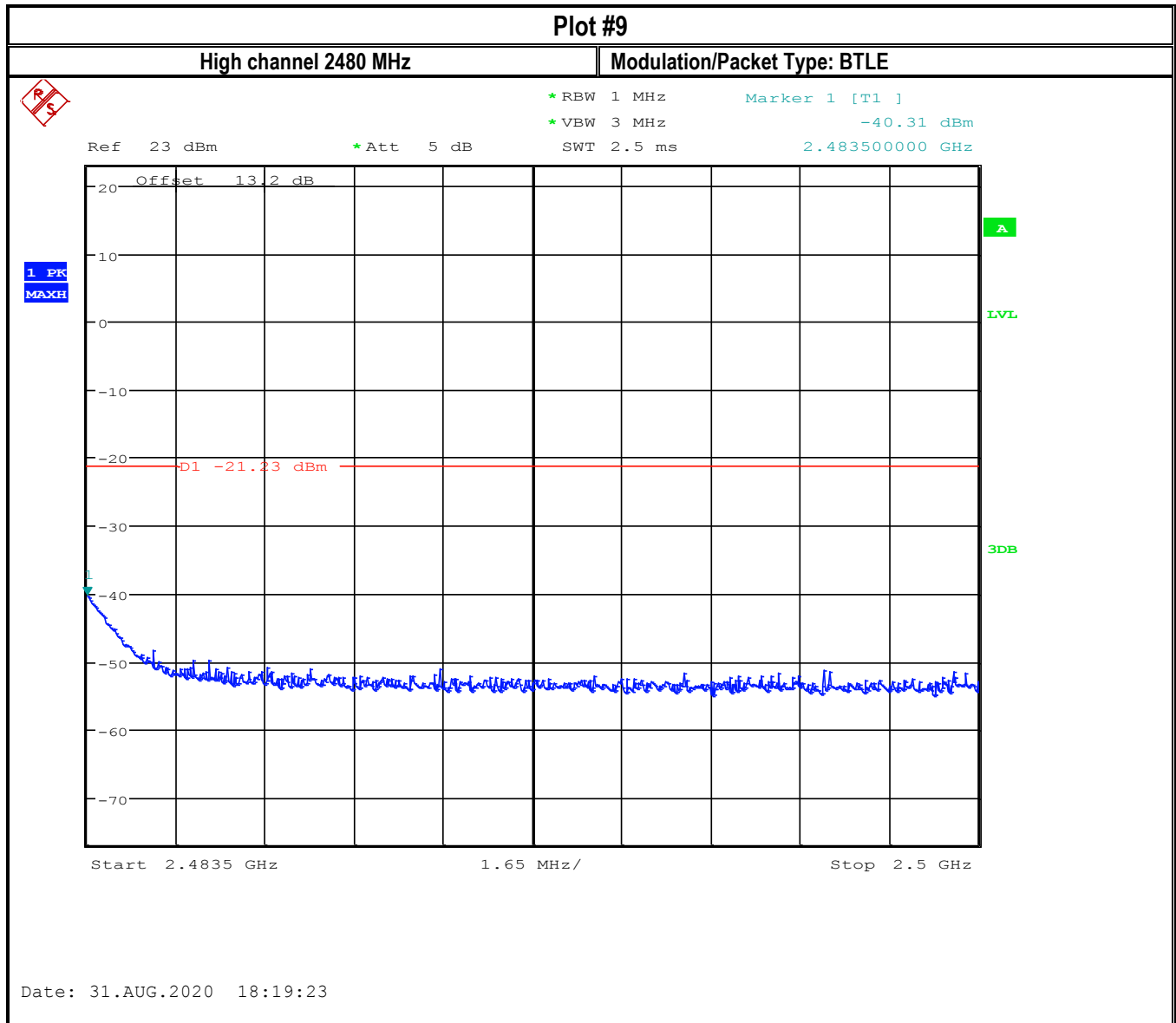
Ref 18 dBm

*Att 5 dB

1 PK
MAXH



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8.5 Emission Bandwidth 6 dB and 99% Occupied Bandwidth

8.5.1 Measurement according to FCC 558074 D01 DTS Meas Guidance v05r02

Spectrum Analyzer settings:

- Set RBW = 100 kHz
- Set the video bandwidth (VBW) $\geq 3 \times$ RBW
- Detector = Peak
- Trace mode = Max hold
- Sweep = Auto couple
- Allow the trace to stabilize
- Measure the maximum width of the emission that is constrained by the frequencies associated with the two outermost amplitude points (upper and lower frequencies) that are attenuated by 6 dB relative to the maximum level measured in the fundamental emission.

8.5.2 Limits:

FCC §15.247(a)(1) and RSS-247 5.2(1)

- Systems using digital modulation techniques may operate in the 902–928 MHz, 2400–2483.5 MHz, and 5725–5850 MHz bands. The minimum 6 dB bandwidth shall be at least 500 kHz.

8.5.3 Test conditions and setup:

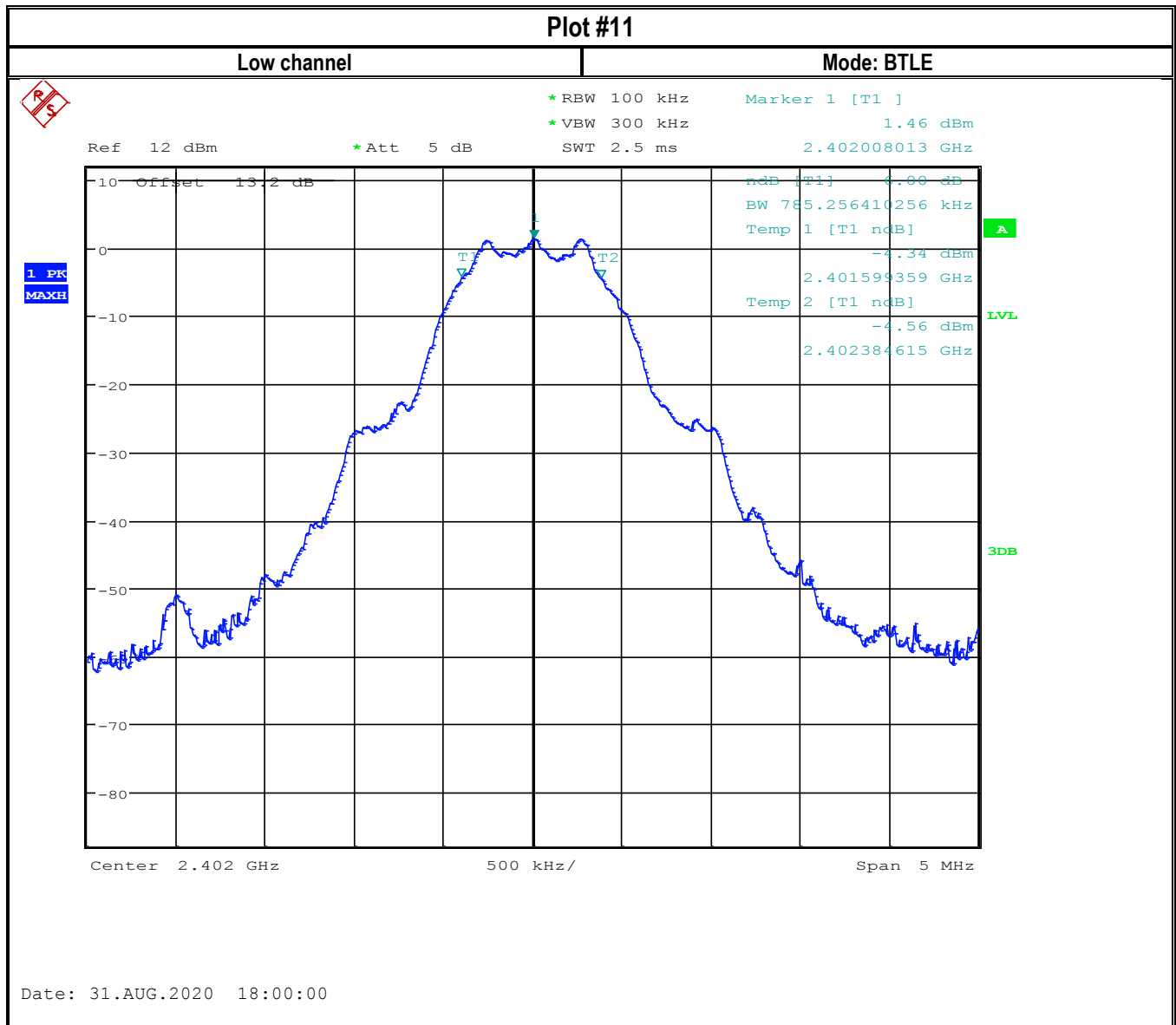
Ambient Temperature	EUT Set-Up #	EUT operating mode	Power Input
22° C	2	GFSK continuous fixed channel	110 VAC

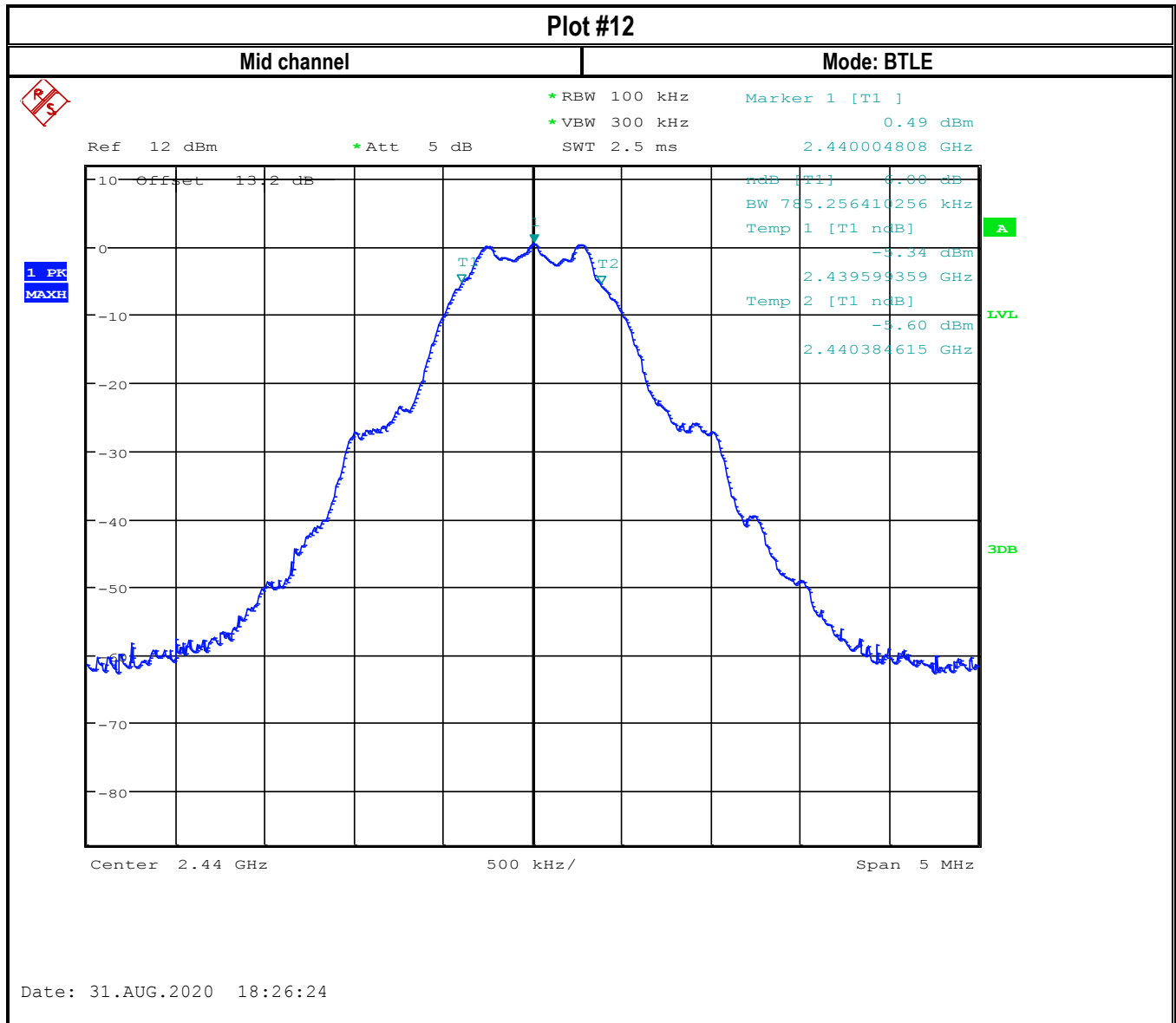
8.5.4 Measurement result:

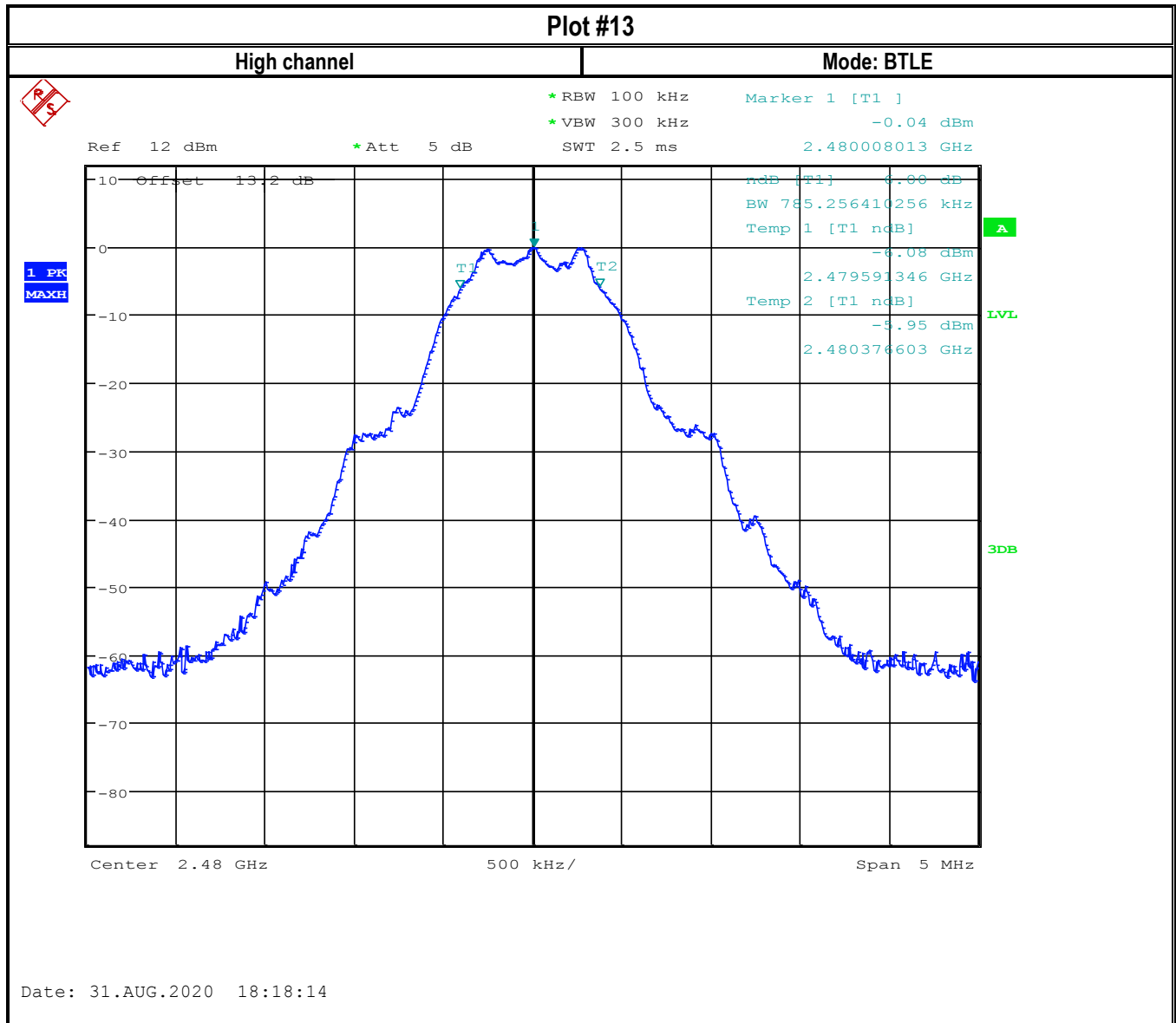
Plot #	Frequency (MHz)	6 dB Emissions Bandwidth (MHz)	Limit (MHz)	Result
11	2402	0.785	> 0.5	Pass
12	2440	0.785	> 0.5	Pass
13	2480	0.785	> 0.5	Pass

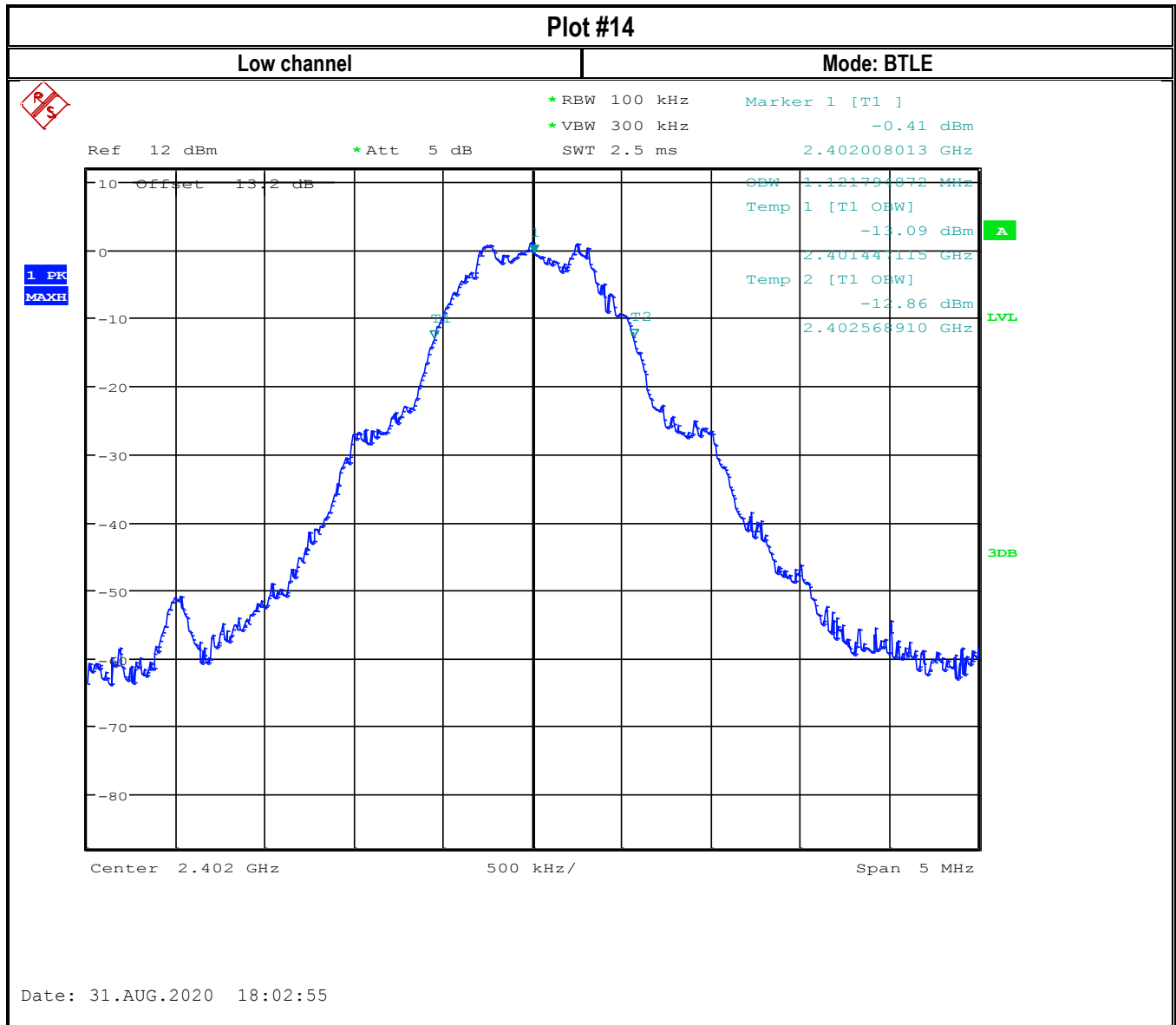
Plot #	Frequency (MHz)	99% Occupied Bandwidth (MHz)	Limit (MHz)	Result
14	2402	1.122	> 0.5	Pass
15	2440	1.122	> 0.5	Pass
16	2480	1.122	> 0.5	Pass

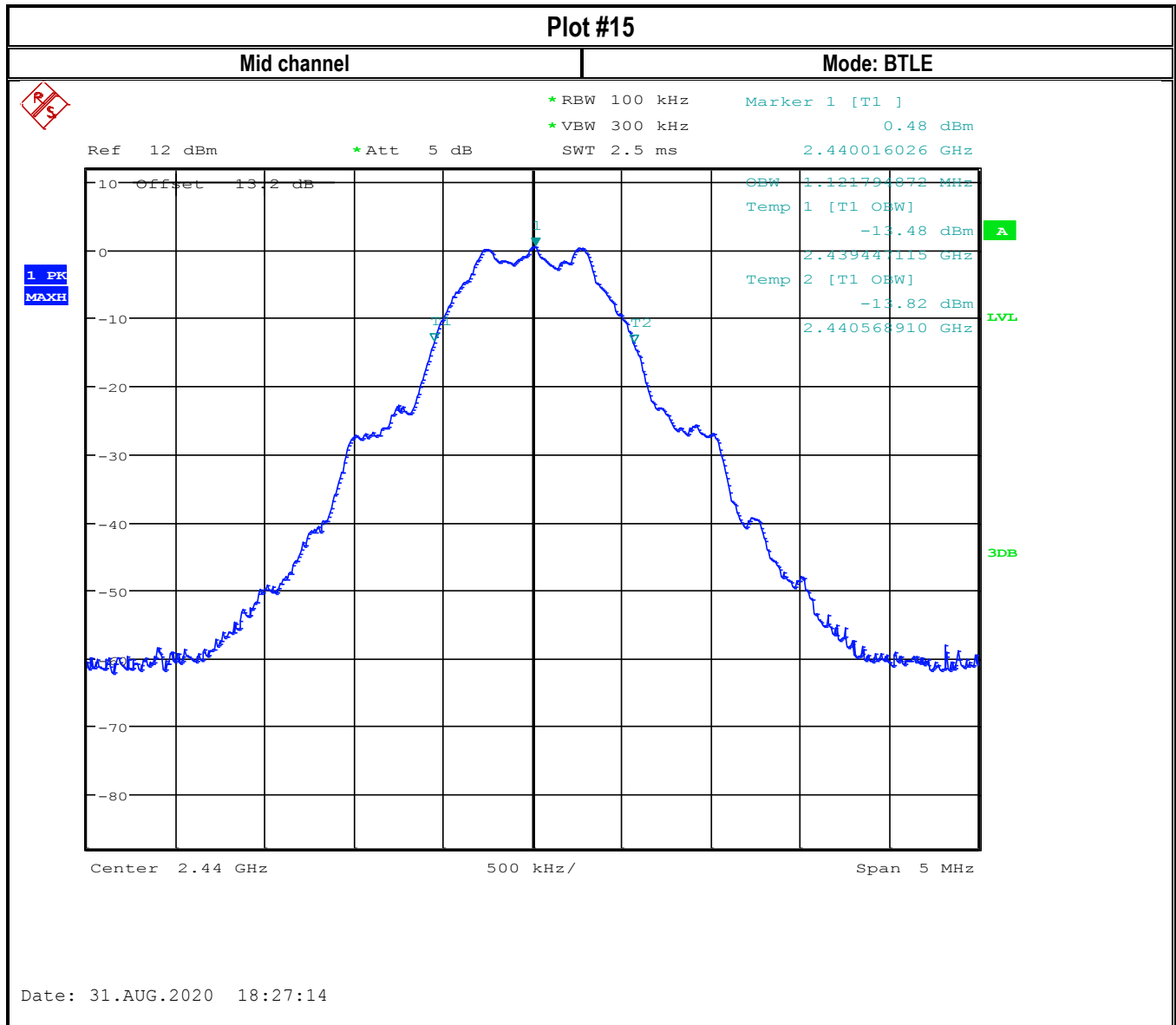
8.5.5 Measurement Plots:

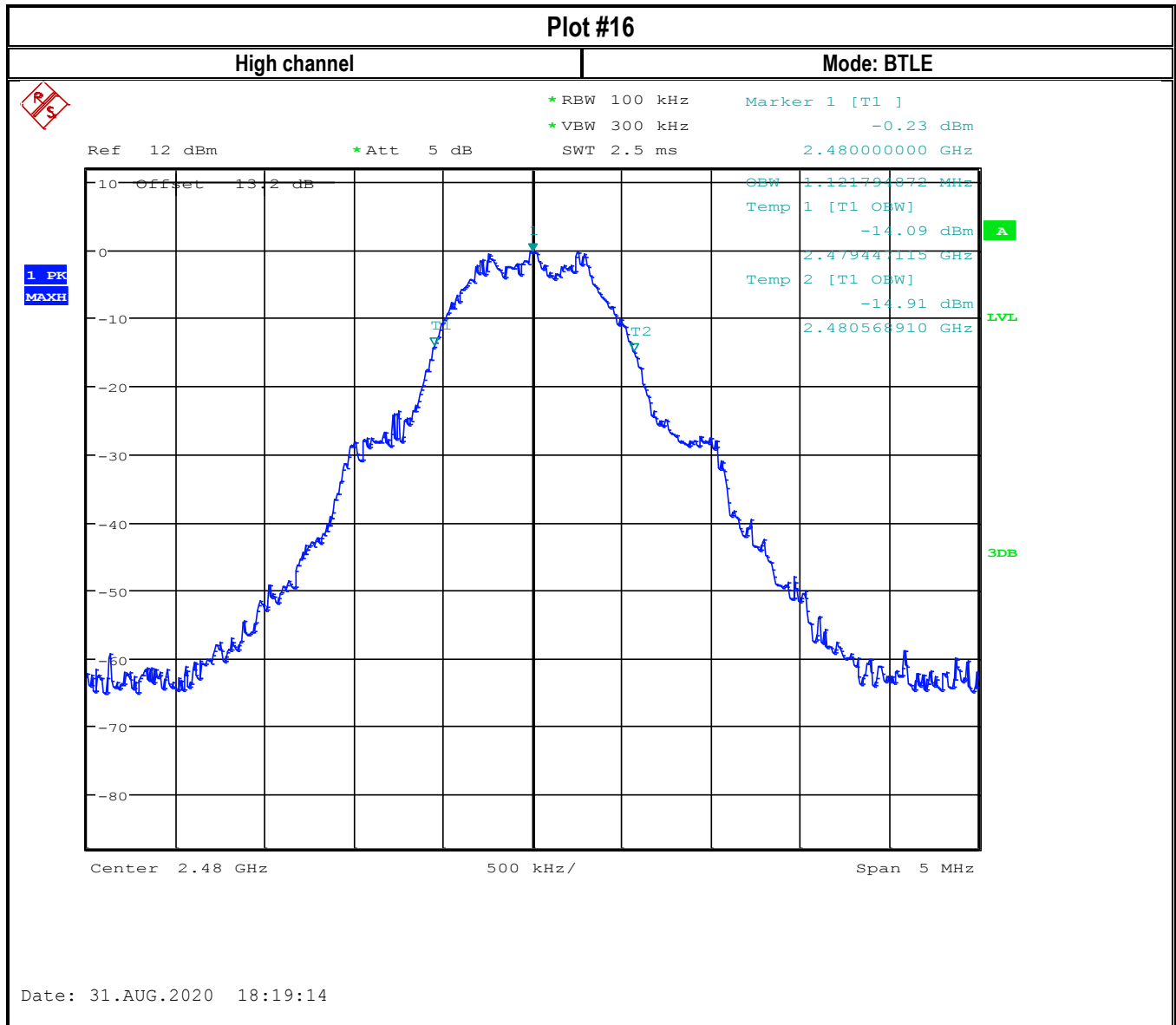












8.6 Radiated Transmitter Spurious Emissions and Restricted Bands

8.6.1 Measurement according to ANSI C63.10 (2013)

Spectrum Analyzer Settings:

- Frequency = 9 KHz – 30 MHz
- RBW = 9 KHz
- Detector: Peak

- Frequency = 30 MHz – 1 GHz
- Detector = Peak / Quasi-Peak
- RBW= 120 KHz (<1GHz)

- Frequency > 1 GHz
- Detector = Peak / Average
- RBW = 1 MHz

- Radiated spurious emissions shall be measured for the transmit frequencies, transmit power, and data rate for the lowest, middle and highest channel in each frequency band of operation and for the highest gain antenna for each antenna type, and using the appropriate parameters and test requirements.
- The highest (or worst-case) data rate shall be recorded for each measurement.
- For testing at distance other than the specified in the standard, the limit conversion is calculated by using 40 dB/decade extrapolation factor as follow: Conversion factor (CF) = $40 \log (D/d) = 40 \log (300m / 3m) = 80dB$

8.6.2 Limits:

FCC §15.247

- In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c)).

FCC §15.209 & RSS-Gen 8.9

- 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 of emission (MHz)	Field strength (μV/m)	Measurement Distance (m)	Field strength @ 3m (dBμV/m)
0.009–0.490	2400/F(kHz) / -----	300	-
0.490–1.705	24000/F(kHz) / -----	30	-
1.705–30.0	30 / (29.5)	30	-
30–88	100	3	40 dBμV/m
88–216	150	3	43.5 dBμV/m
216–960	200	3	46 dBμV/m
Above 960	500	3	54 dBμV/m

FCC §15.205 & RSS-Gen 8.10

- Except as shown in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090-0.110	16.42-16.423	399.9-410	4.5-5.15
10.495-0.505	16.69475-16.69525	608-614	5.35-5.46
2.1735-2.1905	16.80425-16.80475	960-1240	7.25-7.75
4.125-4.128	25.5-25.67	1300-1427	8.025-8.5
4.17725-4.17775	37.5-38.25	1435-1626.5	9.0-9.2
4.20725-4.20775	73-74.6	1645.5-1646.5	9.3-9.5
6.215-6.218	74.8-75.2	1660-1710	10.6-12.7
6.26775-6.26825	108-121.94	1718.8-1722.2	13.25-13.4
6.31175-6.31225	123-138	2200-2300	14.47-14.5
8.291-8.294	149.9-150.05	2310-2390	15.35-16.2
8.362-8.366	156.52475-156.52525	2483.5-2500	17.7-21.4
8.37625-8.38675	156.7-156.9	2690-2900	22.01-23.12
8.41425-8.41475	162.0125-167.17	3260-3267	23.6-24.0
12.29-12.293	167.72-173.2	3332-3339	31.2-31.8
12.51975-12.52025	240-285	3345.8-3358	36.43-36.5
12.57675-12.57725	322-335.4	3600-4400	Above 38.6
13.36-13.41			

- Radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c)).
 *PEAK LIMIT= 74 dBμV/m
 *AVG. LIMIT= 54 dBμV/m

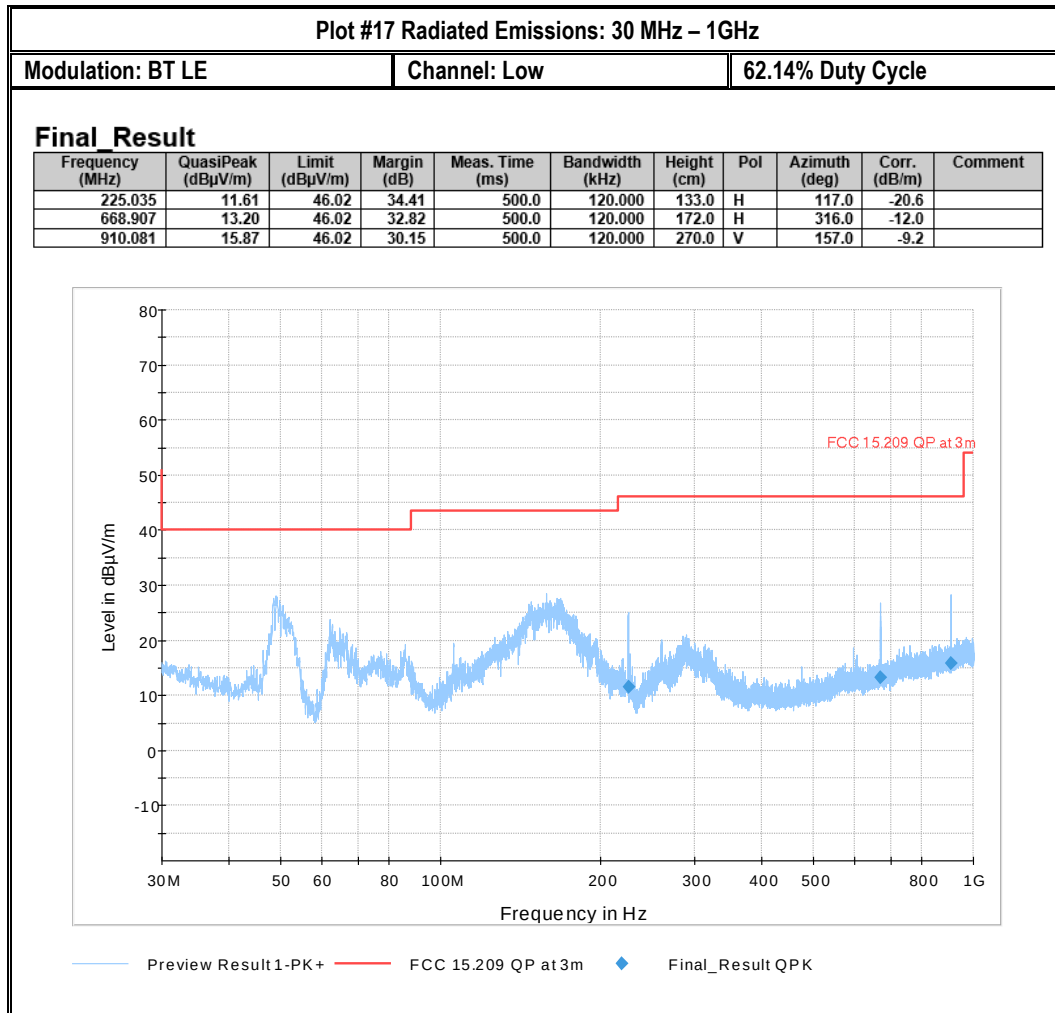
8.6.3 Test conditions and setup:

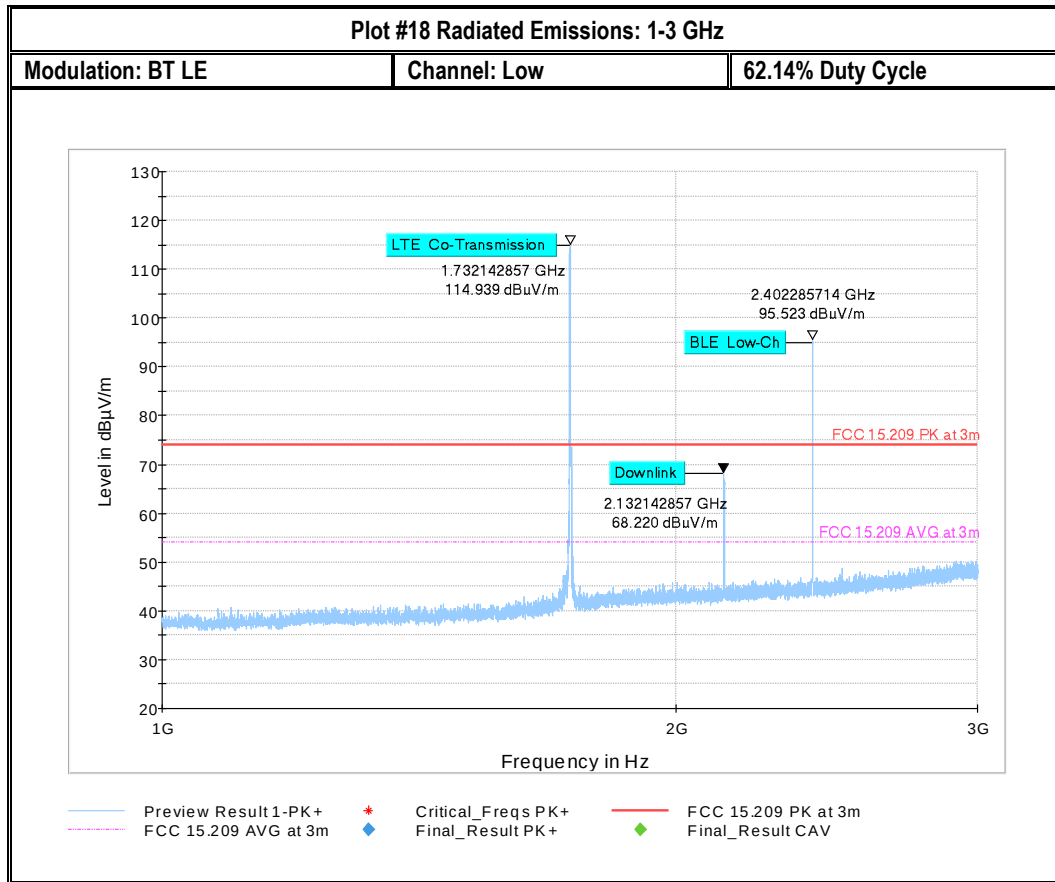
Ambient Temperature	EUT Set-Up #	EUT operating mode	Power Input
23° C	1	GFSK continuous fixed channel	110 VAC

8.6.4 Measurement result:

Plot #	Channel #	Scan Frequency	Limit	Result
17-19	Low	30 MHz – 18 GHz	See section 8.6.2	Pass
20-24	Mid	9 kHz – 26 GHz	See section 8.6.2	Pass
25-27	High	30 MHz – 18 GHz	See section 8.6.2	Pass

8.6.5 Measurement Plots:





Plot #19 Radiated Emissions: 3-18 GHz

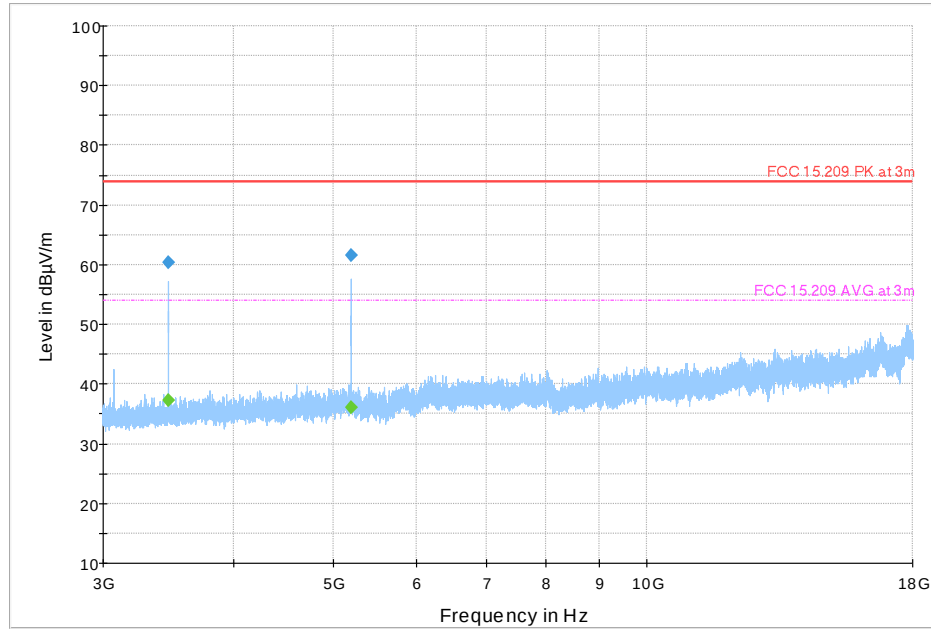
Modulation: BT LE

Channel: Low

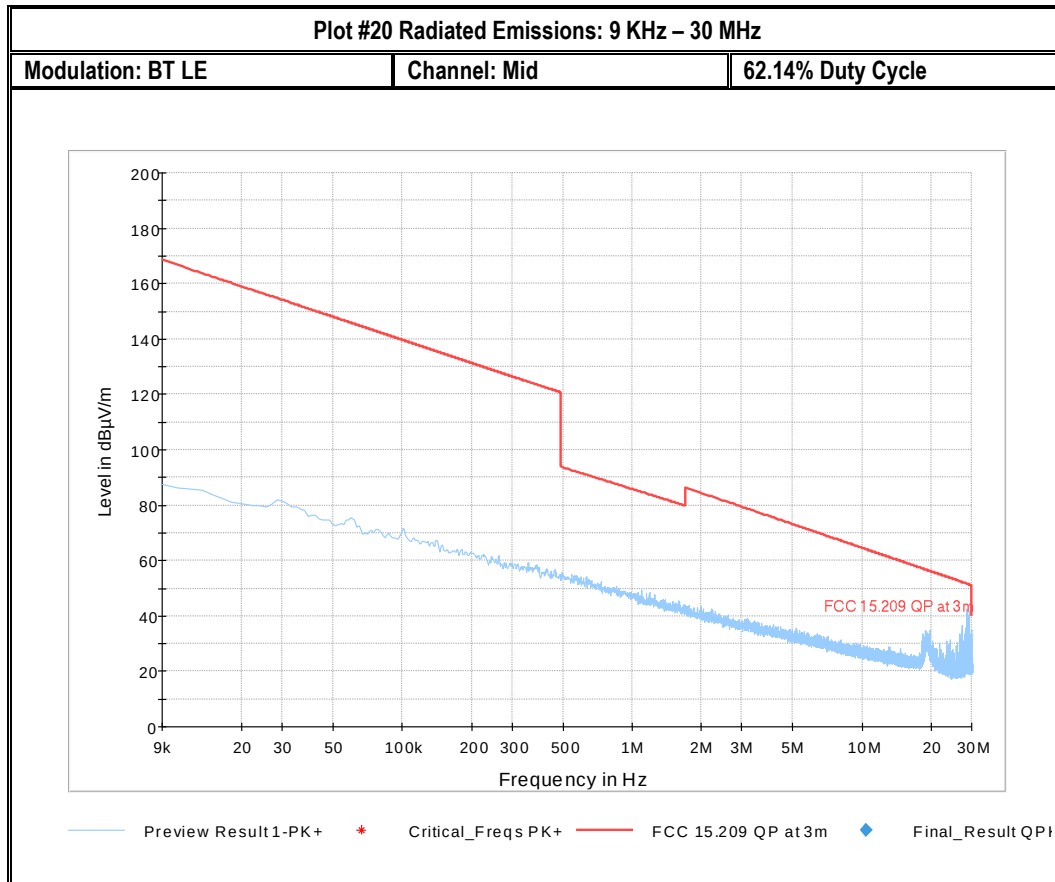
62.14% Duty Cycle

Final Result

Frequency (MHz)	MaxPeak (dBμV/m)	CAverage (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB/m)	Comment
3465.750	60.42	---	73.98	13.56	500.0	1000.000	221.0	V	181.0	-8.2	
3465.750	---	37.31	53.98	16.67	500.0	1000.000	221.0	V	181.0	-8.2	
5199.000	61.51	---	73.98	12.47	500.0	1000.000	257.0	V	29.0	-4.4	
5199.000	---	36.05	53.98	17.93	500.0	1000.000	257.0	V	29.0	-4.4	



— Preview Result 1-PK+ — FCC 15.209 PK at 3m — FCC 15.209 AVG at 3m
◆ Final_Result PK+ ◆ Final_Result CAV



Plot #21 Radiated Emissions: 30 MHz – 1GHz

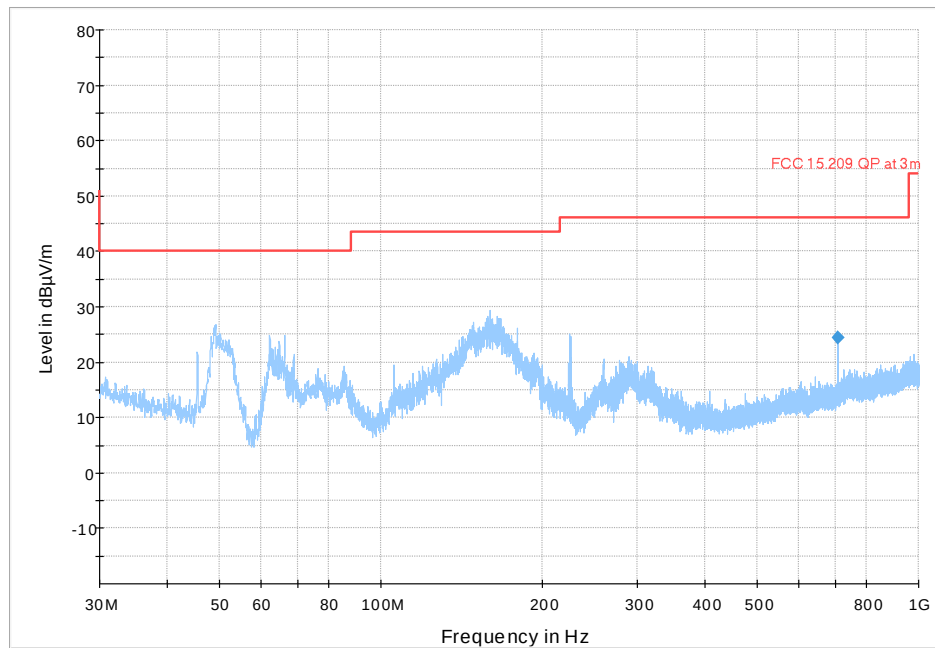
Modulation: BT LE

Channel: Mid

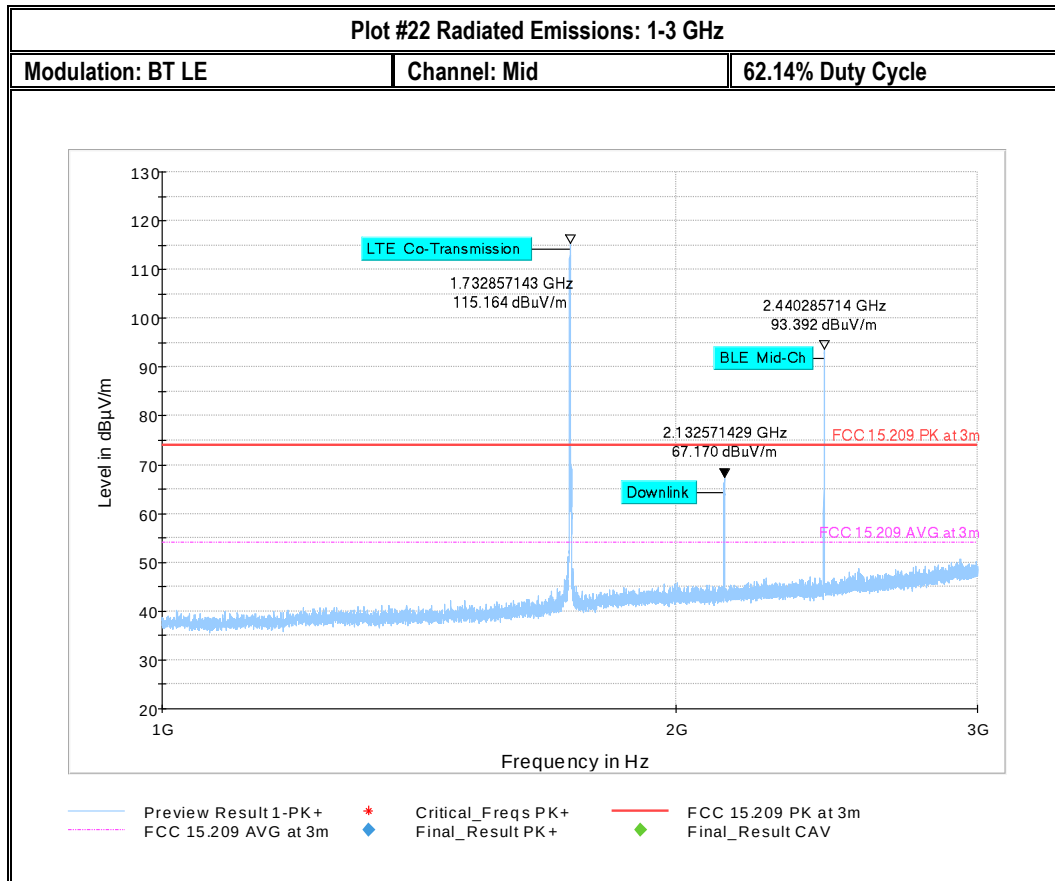
62.14% Duty Cycle

Final Result

Frequency (MHz)	QuasiPeak (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB/m)	Comment
707.513	24.50	46.02	21.52	500.0	120.000	158.0	H	337.0	-11.8	



Preview Result 1-PK+ FCC 15.209 QP at 3m Final_Result QPK



Plot #23 Radiated Emissions: 3-18 GHz

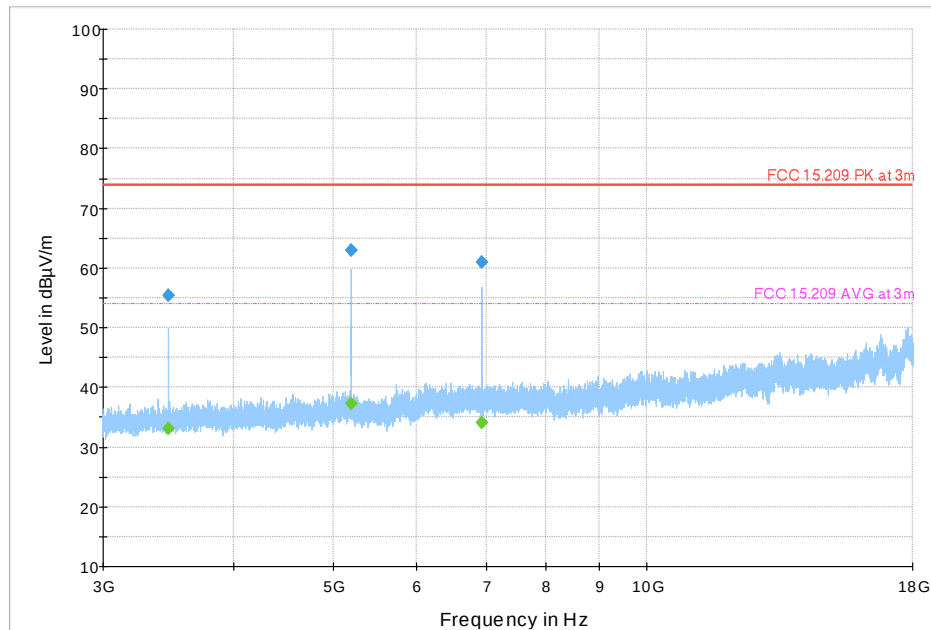
Modulation: BT LE

Channel: Mid

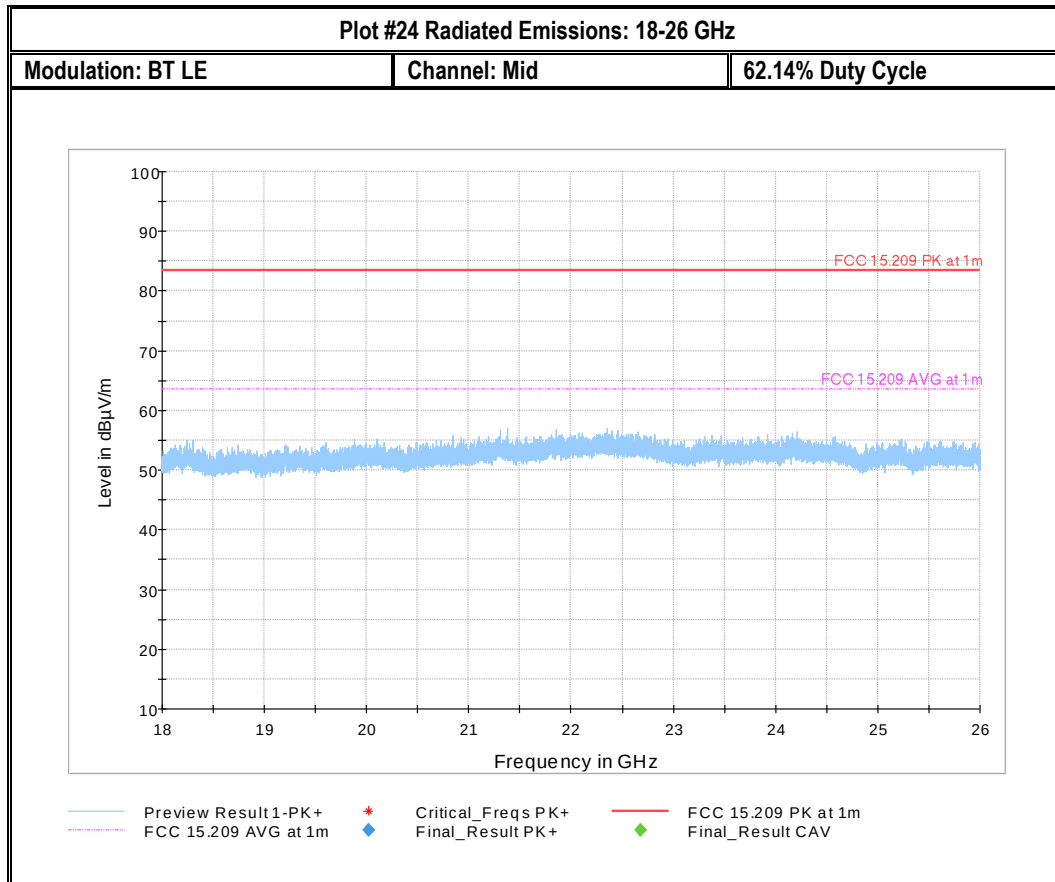
62.14% Duty Cycle

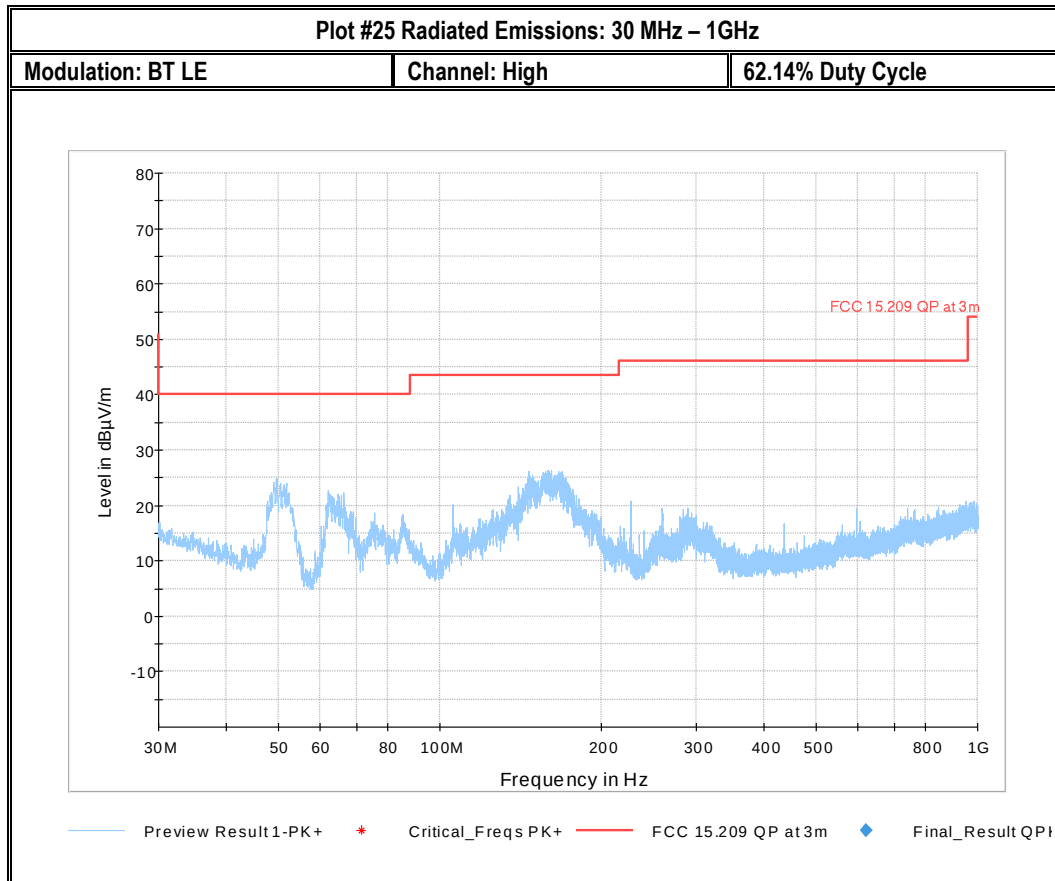
Final Result

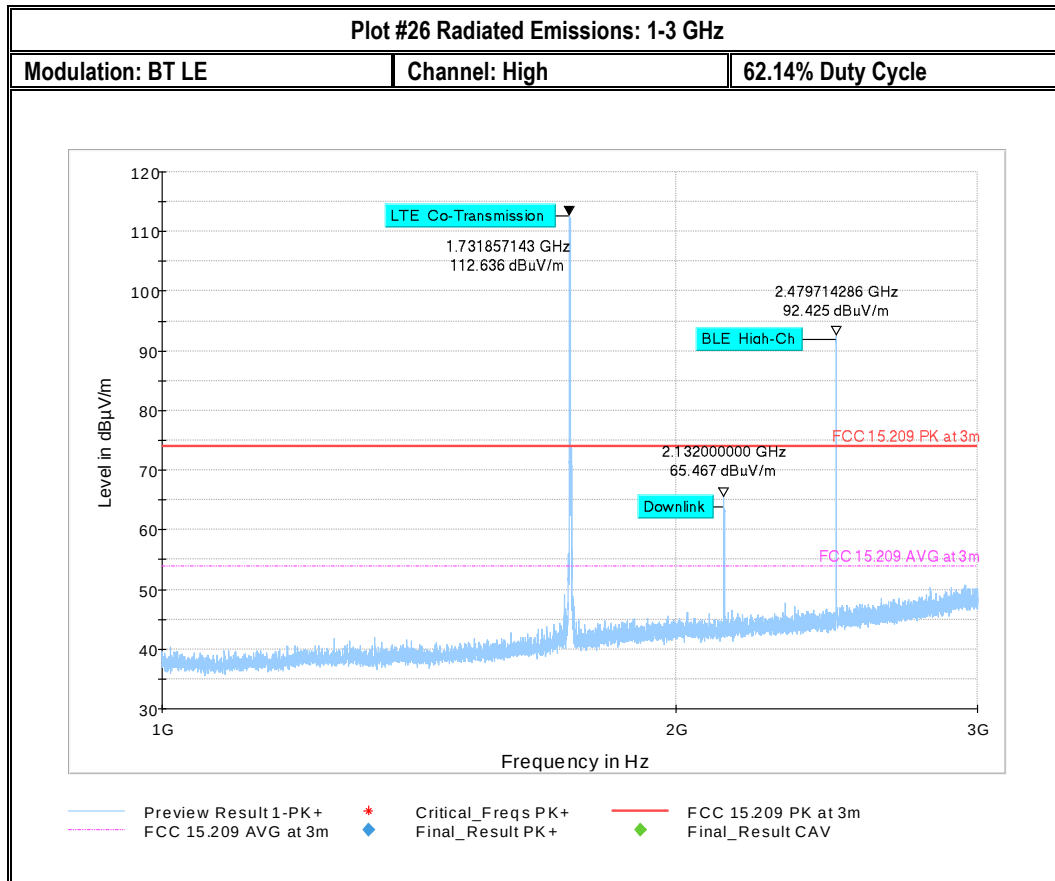
Frequency (MHz)	MaxPeak (dBμV/m)	CAverage (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB/m)	Comment
3465.500	---	33.19	53.98	20.79	500.0	1000.000	193.0	H	17.0	-8.2	
3465.500	55.47	---	73.98	18.51	500.0	1000.000	193.0	H	17.0	-8.2	
5198.500	62.91	---	73.98	11.07	500.0	1000.000	125.0	V	51.0	-4.4	
5198.500	---	37.23	53.98	16.75	500.0	1000.000	125.0	V	51.0	-4.4	
6932.000	61.02	---	73.98	12.96	500.0	1000.000	245.0	H	28.0	-0.7	
6932.000	---	34.09	53.98	19.89	500.0	1000.000	245.0	H	28.0	-0.7	



◆ Preview Result 1-PK+ Final Result PK+
 — FCC 15.209 PK at 3m
 — FCC 15.209 AVG at 3m
 ◆ Final Result CAV







Plot #27 Radiated Emissions: 3-18 GHz

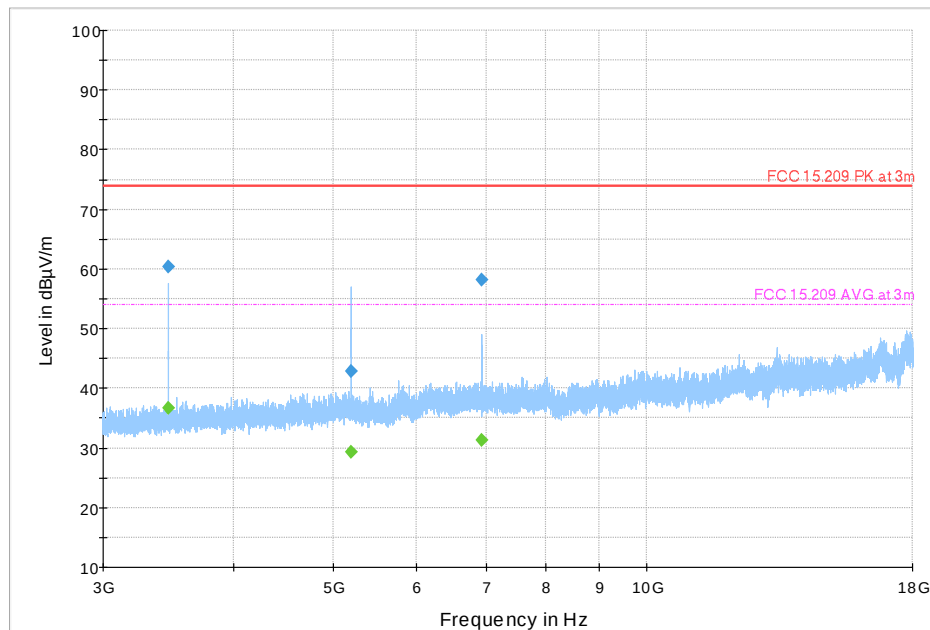
Modulation: BTLE

Channel: High

62.14% Duty Cycle

Final Result

Frequency (MHz)	MaxPeak (dBμV/m)	CAverage (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB/m)	Comment
3465.500	60.35	---	73.98	13.63	500.0	1000.000	314.0	H	247.0	-8.2	
3465.500	---	36.64	53.98	17.34	500.0	1000.000	314.0	H	247.0	-8.2	
5198.500	---	29.38	53.98	24.60	500.0	1000.000	193.0	H	144.0	-4.4	
5198.500	42.90	---	73.98	31.08	500.0	1000.000	193.0	H	144.0	-4.4	
6929.750	58.17	---	73.98	15.81	500.0	1000.000	263.0	H	0.0	-0.7	
6929.750	---	31.40	53.98	22.58	500.0	1000.000	263.0	H	0.0	-0.7	



◆ Preview Result 1-PK+ Final_Result PK+
 — FCC 15.209 PK at 3m
 — FCC 15.209 AVG at 3m
 ◆ Final_Result CAV

8.7 AC Power Line Conducted Emissions

8.7.1 Measurement according to ANSI C63.10 (2013)

Analyzer Settings:

- RBW = 9 KHz (CISPR Bandwidth)
- Pre-scan Detector = Peak / Average for
- Final Measurements Detector = Quasi-Peak / Average

8.7.2 Limits: FCC 15.207 & RSS-Gen 8.8

(a) Except as shown in paragraphs (b) and (c) of this section of the CFR, for an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies, within the band 150 kHz to 30 MHz, shall not exceed the limits in the following table (1), as measured using a 50 μ H/50 ohms line impedance stabilization network (LISN). Compliance with the provisions of this paragraph shall be based on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower limit applies at the boundary between frequency ranges.

Frequency of emission (MHz)	Conducted limit (dB μ V)	
	Quasi-peak	Average
0.15–0.5	66 to 56*	56 to 46*
0.5–5	56	46
5–30	60	50

*Decreases with the logarithm of the frequency.

8.7.3 Test conditions and setup:

Ambient Temperature (C)	EUT Set-Up #	EUT operating mode	Power line (L1, L2, L3, N)	Power Input
22	1	GFSK continuous fixed channel	Line & Neutral	110 V / 60 Hz

8.7.4 Measurement Result:

Plot #	Port	EUT Set-Up #	EUT operating mode	Scan Frequency	Limit	Result
1	AC Mains	1	GFSK continuous fixed channel	150 kHz – 30 MHz	See section 8.7.2	Pass

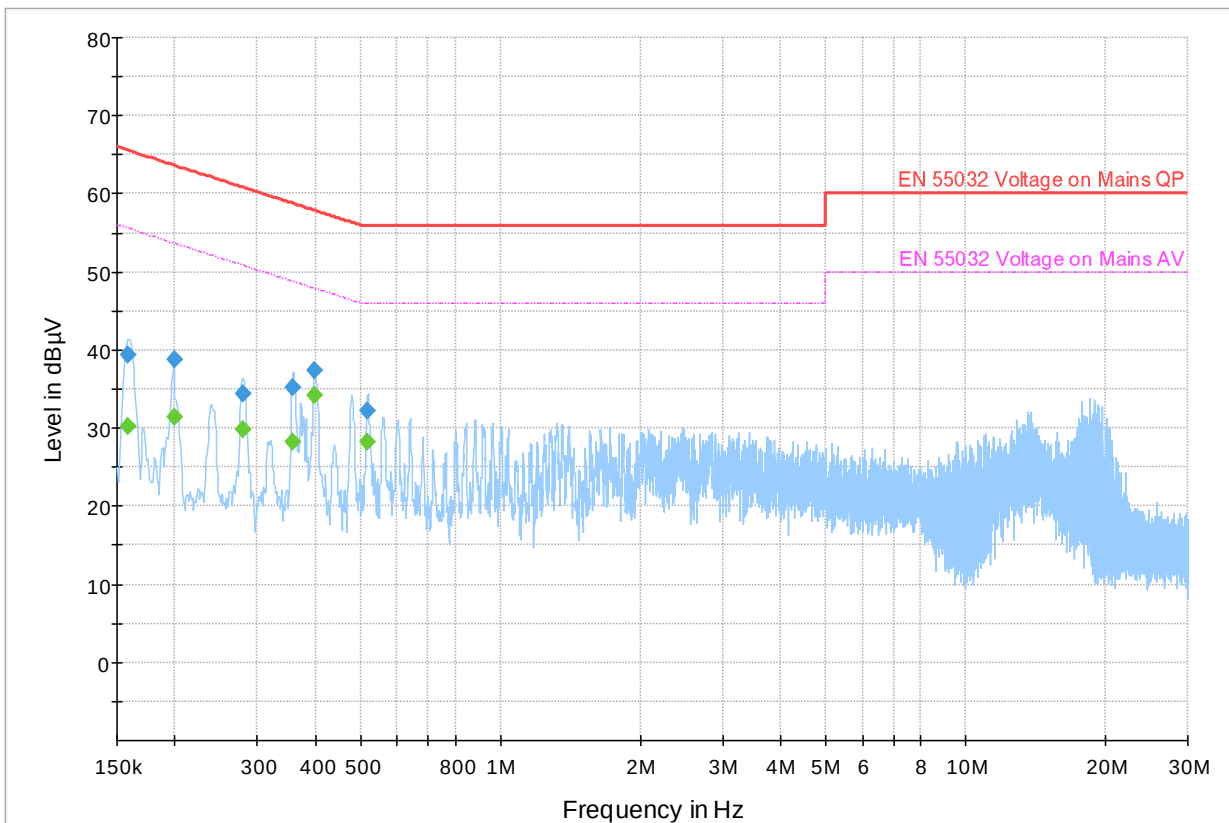
8.7.5 Measurement Plots:

Plot # 1

Disclaimer: Any measurement data within 2dB from the limit line is conditional PASS/FAIL due to measurement uncertainty considerations.

Final_Result

Frequency (MHz)	QuasiPeak (dBμV)	CAverage (dBμV)	Limit (dBμV)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Line	PE	Corr. (dB)	Comment
0.159	39.32	---	65.54	26.22	500.0	9.000	N	GND	10.4	
0.159	---	30.31	55.54	25.23	500.0	9.000	N	GND	10.4	
0.199	38.87	---	63.65	24.78	500.0	9.000	L1	GND	10.2	
0.199	---	31.51	53.65	22.14	500.0	9.000	L1	GND	10.2	
0.280	34.42	---	60.81	26.39	500.0	9.000	L1	GND	10.1	
0.280	---	29.85	50.81	20.96	500.0	9.000	L1	GND	10.1	
0.359	35.19	---	58.75	23.57	500.0	9.000	L1	GND	10.0	
0.359	---	28.28	48.75	20.47	500.0	9.000	L1	GND	10.0	
0.399	37.29	---	57.87	20.57	500.0	9.000	L1	GND	10.0	
0.399	---	34.29	47.87	13.58	500.0	9.000	L1	GND	10.0	
0.519	32.12	---	56.00	23.88	500.0	9.000	L1	GND	10.0	
0.519	---	28.33	46.00	17.67	500.0	9.000	L1	GND	10.0	



◆ Preview Result 1-PK+ Final_Result QPK
 ◆ EN 55032 Voltage on Mains QP Final_Result CAV
 ◆ EN 55032 Voltage on Mains AV

9 Test setup photos

Setup photos are included in supporting file name: "EMC_GARMI_077_20001_Setup_Photos_R1.pdf"

10 Test Equipment And Ancillaries Used For Testing

Equipment Type	Manufacturer	Model	Serial #	Calibration Cycle	Last Calibration Date
ACTIVE LOOP ANTENNA	ETS LINDGREN	6507	00161344	3 YEARS	10/26/2017
BILOG ANTENNA	TESEO	CBL 6141B	41106	3 YEARS	11/01/2017
HORN ANTENNA	ETS.LINDGREN	3115	00035111	3 YEARS	04/17/2019
HORN ANTENNA	ETS LINDGREN	3117	00169547	3 YEARS	09/01/2020
HORN ANTENNA	ETS LINDGREN	3116C	00169535	3 YEARS	09/24/2017
WIDEBAND RADIO COMMUNICATION	R&S	CMW500	109825	3 YEARS	02/12/2018
SIGNAL ANALYZER	R&S	FSV 40	101022	2 YEARS	07/15/2019
COMPACT DIGITAL BAROMETER	CONTROL COMPANY	10510-922	200236891	3 YEARS	04/13/2020
DIGITAL THRMOMETER	CONTROL COMPANY	36934-164	191871994	2 YEARS	01/10/2019
LINE IMPEDANCE STABILIZATION NETWORK	FCC	FCC-LISN-50-25-2-08	08014	3 YEARS	07/19/2019

Note: Equipment used meets the measurement uncertainty requirements as required per applicable standards for 95% confidence levels. Calibration due dates, unless defined specifically, falls on the last day of the month. Items indicated "N/A" for cal status either do not specifically require calibration or is internally characterized before use.

11 Revision History

Date	Report Name	Changes to report	Report prepared by
2020-10-20	EMC_GARMI_077_20001_15.247_BT_DTS	Initial version	Yuchan Lu
2020-11-19	EMC_GARMI_077_20001_15.247_BT_DTS_R1	Changed Marketing name to "N/A"; Changed the client's and manufacture's addresses; Removed the WLAN FCC and IC IDs.	Yuchan Lu

<<The End>>