

Test Report 2024-097

Version A

Issued 27 Jun 2024

Project: GCL-0463

Model Identifier: A04884

Primary Test Standard(s):

CFR 47, FCC Part 15.225

RSS-210 Issue 10 Amd 1

Garmin Compliance Lab

Garmin International

1200 E 151st Street

Olathe Kansas 66062 USA

Client-supplied Information

FCC ID: IPH-04884
IC ID: 1792A-04884



See section 6 of this report regarding the presence or absence of accreditation logos or marks on this cover page.

1. Summary

The equipment or product described in section 5 of this report was tested at the Garmin Compliance Lab according to standards listed in section 6. This report focuses on the NFC transceiver. The results are as follows.

Parameter	Description	Key Performance Values	Result	Data starts at page
Transmitter intentional emissions	Emissions while transmitting must be limited according to a mask that varies across the frequency range 13.110 to 14.010 MHz.[15.225(a) through (c), RSS-210 B.6]	24.4 dB of margin to the intentional emission limit.	PASS	11
Transmitter spurious emissions	Emissions beyond the intended radio band while transmitting must be suppressed a general limit. [FCC 15.225 (d) and RSS 210 B.6]	16.6 dB of margin to the Class B limit.	PASS	18
Conducted Emissions AC Power Port	Radio emissions that this device may generate via its ac power network connections that are not necessary for its operation and that may affect radio communication. [FCC Part 15.205 and RSS-GEN 8.8]	8.1 dB of margin to the appropriate limit. Tested 150 kHz to 30 MHz applying combined Class B limits.	PASS	21
Frequency stability under extreme Conditions	The ability for the radio to accurately maintain carrier frequency stable with changes in temperature and supply voltage. [FCC 15.225 (e) and RSS 210 B.6]	The Carrier frequency was stable within 0.01% of the target frequency.	PASS	25
Other Bandwidths	Bandwidth values are presented for 99% Occupied Bandwidth	There are requirements to report these numbers, but they do not have performance limits.	Reported	27

NT (Not Tested) means the requirement may or may not be applicable, but the relevant measurement or test was not performed as part of this test project.

N/A (Not Applicable) means the lab judged that the test sample is exempt from the requirement.

Table 1: Summary of results

Report Organization

For convenience of the reader, this report is organized as follows:

1. Summary
2. Test Background
3. Report History and Approval
4. Test Sample Modifications and Special Conditions
5. Description of Equipment Tested
6. Test Standards Applied
7. Measurement Instrumentation Uncertainty
8. Selected Examples of Calculations
9. Environmental Conditions During Test
10. Immunity Performance Criteria

Annex: Test records are provided for each type of test, following the order and page numbering stated in the summary table. Concluding notes appear on the final page of this report.

Due to confidentiality, certain material (such as test setup photographs) has been removed from this report and placed in GCL Test Report 2024-105. That report is treated as a part of this document by way of this reference.

2. Test Background

2.1 The Test Lab

The testing reported here was performed at the Garmin Compliance Lab, an organization within Garmin International, located at 1200 E 151st St, Olathe Kansas, USA. The contact telephone number is +1.913.397.8200.

2.2 The Client

The testing was performed on behalf of the Garmin design group, a separate organization located at 1200 E 151st St, Olathe Kansas, USA. Witnesses from the business group included: None.

2.3 Other Information

Test Sample received: 01 May 2024
Test Start Date: 08 May 2024
Test End Date: 17 Jun 2024

The data in this test report apply only to the specific samples tested.

Upon receipt all test samples were believed to be properly assembled and ready for testing.

3. Report History and Approval

This report was written by Andy Heier and initially issued on 27 Jun 2024 as Version A.

Report Technical Review:

David Arnett
Technical Lead EMC Engineer



Report Approval:

Shruti Kohli
Manager Test and Measurement (EMC, Reliability and Calibration)



4. Test Sample Modifications and Special Conditions

The following special conditions or usage attributes were judged during test to be necessary to achieve compliance with one or more of the standards listed in section 6 of this report:

None

The following modifications to the test sample(s) were made, and are judged necessary to achieve compliance with one or more of the standards listed in section 6 of this report:

None

5. Description of the Equipment Tested

5.1 Unique Identification

Product Model A04884
Serial Numbers Tested 8LY000163, 8LY000159

This product tested is a mobile device for collecting and sharing data with the user and nearby electronic devices.

The client affirmed that the test samples will be representative of production in all relevant aspects.

5.2 Key Parameters

EUT Input Power: 5 Vdc
I/O Ports: USB
Radio Transceivers: Bluetooth Low Energy, ANT, NFC
Radio Receivers: GPS L1, GPS L5, Galileo E1, Galileo E5a/b, BeiDou, GLONASS
Primary Functions: Data collection and communication
Typical use: Portable in multiple orientations
Highest internal frequency: 2.484 GHz
Firmware Revision 2.04

5.3 Operating modes

During test, the EUT was operated in one or more of the following modes.

Mode 3: M3 (BleTx). Bluetooth Low Energy radio transmitting consistently on a selected channel at 1 Mbps or 2 Mbps.

Mode 4: M4 (BleLnk). Bluetooth Low Energy radio is paired to a companion device, transmitting and receiving data on various channels in accordance with the protocol, and maintaining the paired relationship.

Mode 5: M5 (AntTx). ANT radio transmitting consistently on a selected channel.

Mode 6: M6 (AntLnk). ANT radio is paired to a companion device, transmitting and receiving data in accordance with the protocol, and maintaining the paired relationship.

Mode 9: M9 (RxBtBIA). The radio was set to receive 2.4 GHz signals but not transmitting in Bluetooth, Bluetooth low energy or ANT.

Mode 12: M12 (NfcRdr). The NFC radio was transmitting and actively linked to a NFC Card Reader.

Mode 13: M13 (GNSS). The Global Navigation Satellite System receiver is monitoring the GNSS bands, attempting to detect a constellation and determine location. Unless otherwise noted, the EUT was provided simulated GNSS signals representing one of more constellation types. In addition, the EUT may have been reporting signal levels and satellite data to an attached computer to monitor link health.

Mode 14: M14 (NfcIdle). The NFC Radio was powered, but not transmitting or linked to any devices.

Mode 16: M16 (NfcTag). The NFC radio was transmitting and actively linked to a passive NFC tag.

Mode 19: M19 (ML1). Multiple link, combining modes M4 & M6. The EUT is actively paired to both a BLE and an ANT companion device, used for Immunity tests.

Mode 20: M20 (ML2). Multiple link, combining modes M12 & M13. The EUT is actively linked to a NFC card reader and the specified satellite system, used for immunity tests.

5.4 EUT Arrangement

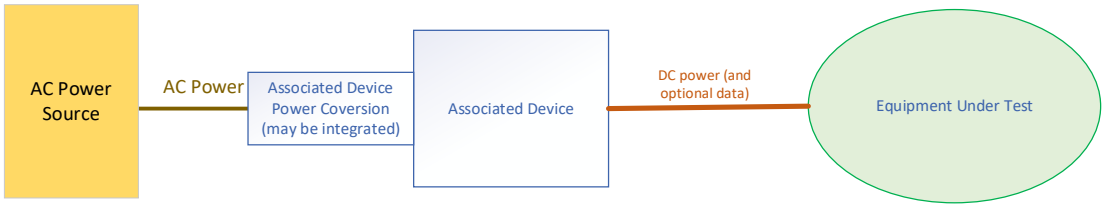
During test, the EUT components and associated support equipment were selected including the following arrangement sets.

Arrangement 1: A1 (Solo). The test sample operates from its battery and no external physical connections. No block diagram is needed for this arrangement.

Arrangement 2: A2 (Upwr). The test sample is attached to a Mains-powered device connected that provides dc power to the sample over a cable but no user data. See the block diagram in Figure 1.

Arrangement 3: A3 (Udata). The test sample is attached to a Mains-powered device connected that provides dc power to the sample and user data over a cable. See the block diagram in Figure 1.

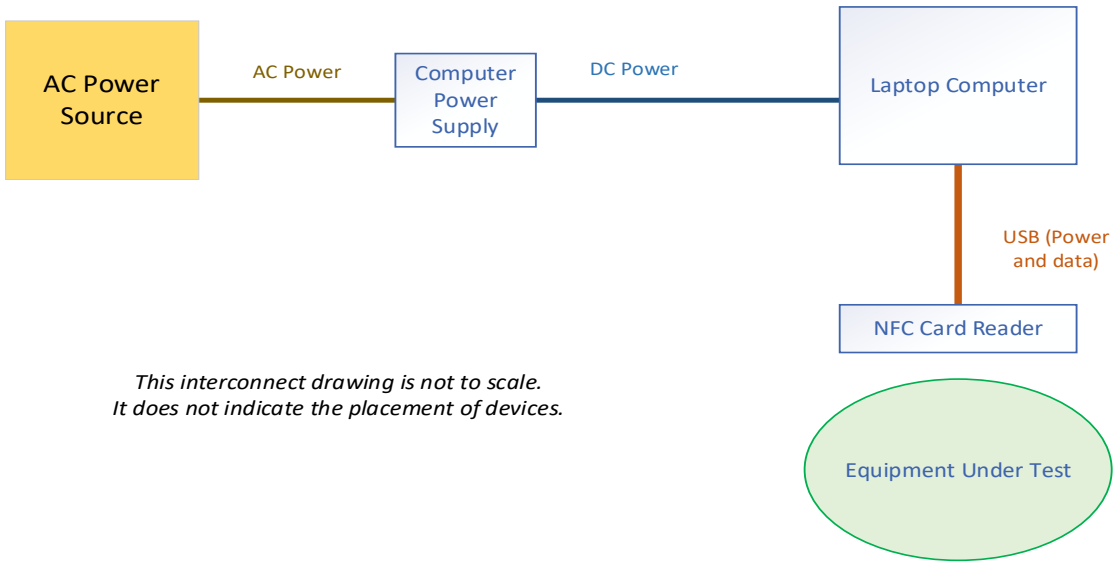
Arrangement 4: A4 (Udc). The test sample is attached to a Mains-powered device connected that provides dc power to the sample and may or may not provide user data. This arrangement is specified in the test plan to provide staff flexibility when the presence or absence of data on the cable is not pertinent. See the block diagram in Figure 1.



*This interconnect drawing is not to scale.
It does not indicate the placement of devices.*

Figure 1: Block diagram of equipment arrangements A2, A3, A4

Arrangement 6: A6 (NFCu). The test sample is powered via internal battery and actively linked to a NCR reader powered by a laptop PC.



*This interconnect drawing is not to scale.
It does not indicate the placement of devices.*

Figure 2: Block diagram of equipment arrangement A6

Arrangement 7: A7 (NFCu). The test sample is powered via internal battery and actively linked to a passive NFC tag.

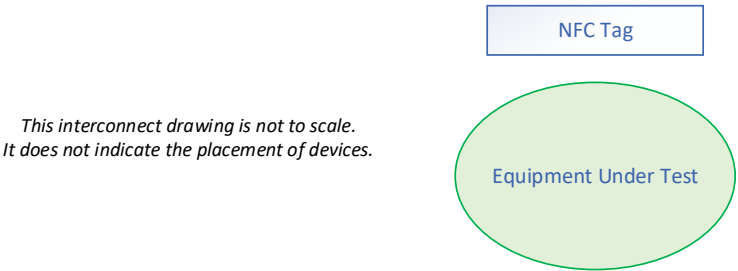


Figure 3: Block diagram of equipment arrangement A7

5.5 Associated Equipment (AE) used

Description	Manufacturer	Model	Serial/Part Number
USB C power adaptor	Phihong (Garmin)	AQ27A-59CFA	362-00118-00
Tablet	Apple	iPad Pro 11 inch	DMPZ7582KD6L
Laptop	Dell	Latitude 5410	5VSPFB3
Power Supply	Dell	HA65NM191	0BD-7TC0-A02
Phone	Samsung	SM-G973U (S10)	RF8MC0W9XVR
NFC Card Reader	ACS	ACR1252U-M1	RR554-118449
NFC Tag	SANPOPO	NTAG215	PD-STICKER-B-30

Table 2: List of associated equipment that may have been used during test

5.6 Cables used

Description	From	To	Length	EMC Treatment
USB C to custom cable	Power and/or Data source	EUT	0.5m	none

Table 3: List of cables that may have been used during test

6 Test Standards Applied

6.1. Accredited Standards

The following test or measurement standards were applied and are within the scope of the lab's accreditation. All results in this report that cite these standards are presented as Accredited results consistent with ISO/IEC 17025.

CFR 47, FCC Part 15, Subpart C 15.225

ANSI C63.10: 2013

RSS-210 Issue 10 Amd 1

6.2. Non-accredited Standards

The following test or measurement standards were applied and are either outside the scope of the lab's accreditation, or were performed in such a way that results are not presented as being fully accredited.

None.

6.3 Variances

The following variances were applied to standards cited in this section.

Where different test standards cover the same test parameter or phenomenon, and the standards have compatible differences, the stricter of the requirements is typically applied. For example, a consolidated limit may be applied to emission tests selecting the strictest of the limits at each frequency. Likewise, if one standard requires a vertical antenna sweep with bore sighting and another does not, swept motion with bore sighting will typically be used as it is the more stringent requirement.

6.4 Laboratory Accreditation

The Garmin Compliance Lab, an organization within Garmin International, is registered with the US Federal Communication Commission as US1311. The lab is recognized by the Canada Department of Innovation, Science, and Economic Development (ISED) under CAB identifier US0233.

The Garmin Compliance Lab, an organization within Garmin International, is accredited by A2LA, Certificate No. 6162.01. The presence of the A2LA logo on the cover of this report indicates this is an accredited ISO/IEC 17025 test report. If the logo is absent, this report is not issued as an accredited report. Other marks and symbols adjacent to the A2LA logo are accreditation co-operations of which A2LA is a member under a mutual recognition agreement, and to which the Garmin Compliance Lab has been sublicensed.

7 Measurement Instrumentation Uncertainty

The lab has analyzed the sources of measurement instrumentation uncertainty. The analysis concludes that the actual measurement values cited in this report are accurate within the U_{LAB} intervals shown below with approximately 95% statistical confidence. Where the report shows a judgment that a test sample passes a test against a published limit based on these measured values, that judgment has a statistical confidence of 97.5% or greater. Measurement Instrumentation Uncertainty is one component of over-all measurement uncertainty, and other uncertainty components are not considered as part of this analysis.

The primary benchmark for measurement instrumentation uncertainty (MIU) in an electromagnetic compatibility (EMC) test lab is the set of U_{CISPR} values published in CISPR 16-4-2. In all cases where a U_{CISPR} value is published by CISPR, the analysis shows that U_{LAB} – this lab's estimated MIU – is better than the U_{CISPR} benchmark.

The secondary benchmark for MIU in an EMC lab performing radio transceiver tests is a set of uncertainty limit values published in various ETSI standards. In this report, U_{ETSI} is the most restrictive of the values found in the ETSI EN standards listed in section 5 of this report. The analysis principles are described in the ETSI TR documents listed there. In most cases U_{LAB} is better than the U_{ETSI} benchmark. Where U_{LAB} exceeds the U_{ETSI} benchmark cited here, that entry is preceded by an asterisk. When required by the ETSI EN standards, excess uncertainty will be added to the measurand before comparison to a limit. In an individual test report, staff may re-evaluate that excess uncertainty based on the uncertainty of the method used and the uncertainty limits of the actual ETSI EN standard being applied, and the revised uncertainty values will be shown in the test report.

Some measurement uncertainties analyzed and reported here are not addressed in CISPR 16-4-2 or the ETSI standards, as indicated by the entry 'None.'

Test Type	U_{LAB}	U_{CISPR}	U_{ETSI}
Conducted DC voltage	0.09% + 2 x LSDPV	None	1%
Conducted AC voltage below 500 Hz	1.0% + 3 x LSDPV	None	2%
Conducted Emissions, Mains Voltage	0.10% + 10 mV	None	None
Conducted Emissions, Mains Current	0.10% + 3 mA	None	None
Conducted Emissions, Mains Power	0.15% + 100 mW	None	None
Conducted Emissions, Power Mains, 9 kHz to 150 kHz	1.49 dB	3.8 dB	None
Conducted Emissions, Power Mains, 150 kHz to 30 MHz	1.40 dB	3.4 dB	None
Conducted Emissions, Cat 6 LCL, 150 kHz to 30 MHz	2.80 dB	5 dB	None
Conducted Emissions, Cat 5 LCL, 150 kHz to 30 MHz	3.21 dB	5 dB	None
Conducted Emissions, Cat 3 LCL, 150 kHz to 30 MHz	4.24 dB	5 dB	None
Radiated Emissions, below 30 MHz	0.88 dB	None	6 dB
Radiated Emissions, 30 MHz to 1000 MHz	2.77 dB	6.3 dB	6 dB
Radiated Emissions, 1 GHz to 18 GHz	2.60 dB	5.2 & 5.5 dB	6 dB
Radiated Emissions, 18 GHz to 26.5 GHz	2.73 dB	None	6 dB
*Radio Signal Frequency Accuracy	1.55×10^{-7}	None	1.0×10^{-7}
Radio Signal Occupied Bandwidth	0.95%	None	5%
Radio Power or Power Spectral Density	0.98 dB	None	1 dB
Temperature	0.38 °C	None	1 °C
Barometric Pressure	0.38 kPa	None	None
Relative Humidity	2.85% RH	None	±5% RH
Signal Timing	The greater of these three...	None	None
	0.01% of value		
	0.5 x LSDPV		

Note: LSDPV stands for the Least Significant Digit Place Value reported. In the value 1470 msec, the least significant digit is the 7. It has a 10 msec place value. The LSDPV is thus 10 msec and the maximum error due to roundoff would be 5 msec. If the time value were reported as 1470 msec, the underscore indicates that the 0 is a significant figure and the error due to roundoff would be 0.5 msec. All digits provided to the right of a decimal point radix are significant.

8 Selected Example Calculations

Certain regulators require samples of the calculations that lead from the raw measurement to the final result for AC Mains conducted and unintended radiated emissions. The assumption is that the lab performs raw measurements, then adds, subtracts, multiplies, or divides based on transducer factors, amplifier gains, and losses in the signal transmission path. In this lab, our CISPR 16 Receiver does not work that way. The calibration factors and losses and gains are provided to the receiver as detailed data files. These factors are applied in the RF measurement path prior to the detector. But as a step in the lab measurement process, staff frequently verify that these factors are applied correctly. They make a measurement with the factors applied inside the receiver, then they disable the factors and remeasure the result manually adding in the various relevant factors.

The transmission loss is measured including the combined losses and gains of preamplifiers, cables, and any band-selective filters. In many cases above 1 GHz it is a negative value, indicating that the preamplifier gain is greater than these other losses.

Here are examples of these calculations. The data in these examples was not taken as part of this project:

8.1 AC Mains conducted emissions at 22 MHz

(Raw measurement) + (AMN factor) + (transmission loss) = Result

(7.145 dBuV) + (9.812 dB) + (0.216 dB) = 17.173 dBuV

8.2 Radiated Emissions at 630 MHz

(Raw measurement) + (Antenna factor) + (transmission loss) = Result

(2.25 dBuV) + (27.80 dB/m) + (2.89 dB) = 32.94 dBuV/m

8.3 Radiated Emissions at 2.7 GHz

(Raw measurement) + (Antenna factor) + (transmission loss) = Result

(43.72 dBuV) + (32.22 dB/m) + (-36.09 dB) = 39.85 dBuV/m

9 Environmental Conditions During Test

Environmental conditions in the test lab were monitored during the test period. Temperature and humidity are controlled by an air handling system. As information to the reader, the conditions were observed at the values or within the ranges noted below. For any tests where environmental conditions are critical to test results and require further constraints or details, the test records in the annex may provide more specific information.

Temperature:	20.7 to 22.7 °C
Relative Humidity:	42% to 53% (non-condensing)
Barometric Pressure	96.2 to 98.6 kPa

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
Barometer	Traceable	6453	221702700	3-Aug-2022	1-Aug-2024

Table 4: Environmental monitoring device

10 Immunity Performance Criteria

If this report includes immunity tests then results have been categorized as Performance Criteria A, B, C, or D. The standards that the lab applied will define the details for A, B, and C, as well as which criterion is required for each type of test. They will also define the electrical stresses that were applied during each test. In a very general sense the observed criteria noted in this report are as follows:

Criterion A. The stress applied did not alter product operation. This criterion is generally used for ‘continuous’ stresses that can be present for a long time in the places the product will be used, or that can appear often, even though they may come and go over time.

Criterion B. The stress applied altered product operation, but the product self-recovered so that the user would not have to try to figure out how to restore it to full operation. This criterion is generally used for ‘transient’ stresses that appear briefly and occasionally, but are usually not present in the places the product will be used.

Criterion C. The stress applied altered product operation, but the user could restore it to full operation, for example by power cycling the product. This criterion is generally used for ‘transient’ stresses that appear briefly and only rarely in the places the product will be used.

Criterion D. This is not an official criterion in the standards, because it would be a failure of the requirements. This indication in a test record means the product was affected in a way that the user might not be able to correct. The effect could include some degree of hardware damage, or it could include loss of program files or data files necessary for operation.

Repeatability is an issue in all EMC immunity work. When the product operation changes unexpectedly during a test, and the change would fail the requirements of the standard, this is an anomaly. The test operator needs to determine whether the anomaly was a result of the applied electrical stress. The investigation is done by repeating the section of the test where the anomaly occurred three times. If the same or a similar anomaly occurs in any of the three repeat trials, it is confirmed as a response to the stress. If not, the anomaly is judged unreproducible and is not considered when judging the A, B, or C observed performance. Since there is usually no ability to confirm a Criterion D anomaly, these are usually treated as Criterion D upon a single occurrence.

Tests that require Criterion B performance will be judged to Pass if criteria A or B is observed. Similarly, tests that require Criterion C performance will be judged to Pass if criteria A, B, or C is observed.

ANNEX

The remainder of this report is an Annex containing individual test data records. These records are the basis for the judgments summarized in section 1 of this report. The Annex ends with a set of concluding notes regarding use of the report.

Test Record
Radiated Emission Test RE18
Project GCL0463

Test Date(s) 21 May 2024
Test Personnel David Kerr

Product Model A04884
Serial Number tested 8LY000163

Operating Mode M16 (NFCTag) Mode A
Arrangement A7 NFCu
Input Power Battery

Test Standards: FCC Part 15, ANSI C63.10, RSS-210 (as noted in Section 6 of the report).

Frequency Range: 10 MHz to 30 MHz

Pass/Fail Judgment: PASS

Test record created by: David A Kerr
Date of this record: 21 May 2024

Original record, Version A.

Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	1-Oct-2024
Loop antenna, amplified	Schwarzbeck	FMZB 1519B	00174	12-Jun-2023	15-Jun-2024
SAC 3m, below 1 GHz	Frankonia	SAC3	F199004	7-Nov-2022	7-Nov-2025
Tape measure, 1" x 33'	Lufkin	PHV1410CMEN	10721	30-Aug-2023	1-Sep-2026

Table RE18.1: Test Equipment Used

Software Used

PXE Firmware version A.32.06
RE 150k to 30M Signal Maximization Tool V1 2021Mar17.xlsx
RE 9k to 30M XYZ_orientations_TemplateV7.xlsm
RE NFC 150k to 30M Data Analysis Template V23 2024Mar20.xlsx

Test Data

The radiated emission test process began with a preliminary scan at multiple turntable angles, and three antenna polarizations typically described as X, Y, and Z. Subsequent testing was done using the antenna polarization(s) producing the highest result relative to the test limit. Where the test standard requires cable manipulation, this was done at one of more likely worst case frequencies selected by the test personnel while observing the receiver display. At each of the frequencies selected for final measurements, the turntable angle, and antenna polarization were explored to find the worst-case settings. Final field strength measurements were taken in that set of positions. Full maximization was not performed at frequencies that are noise floor measurements included per the test standard requirements.

At azimuth angle 0° the 'front' reference mark of the turntable is pointed Southward. At 90° the reference mark points West. At -90° it points East. The designation of the X, Y, and Z antenna polarizations are reported by use of photographs.

The table shows the selected final measurement data between 10MHz and 30MHz. It includes at least the six strongest emissions observed relative to the test limit, along with other data points of interest. Where a data point is highlighted in yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive margin value indicates that the emission was below the test limit. The test limit is the FCC Class B Limit at 3m. Any unintentional radio emission limits are not applied to intentional radio signals.

Frequency (MHz)	Limit (dBuV/m)	Limit (dBuA/m)	Measured (dBuV/m)	Measured (dBuA/m)	Margin (dB)	Azimuth (degree)	Height (mm)	Antenna Orientation
11.865	49.5	-2.0	21.4	-30.1	28.1	87	1500	X
12.714	49.5	-2.0	22.8	-28.7	26.7	90	1500	X
13.560	104.0	52.5	47.0	-4.5	57.0	95	1500	X
14.408	49.5	-2.0	24.8	-26.7	24.7	94	1500	X
15.256	49.5	-2.0	23.2	-28.3	26.3	92	1500	X
24.591	49.5	-2.0	20.9	-30.6	28.6	-42	1500	Y

Table RE018.2: Emission summary

The graph below shows the background spectrum observed during pre-scan, as well as the final data points from the tables above.

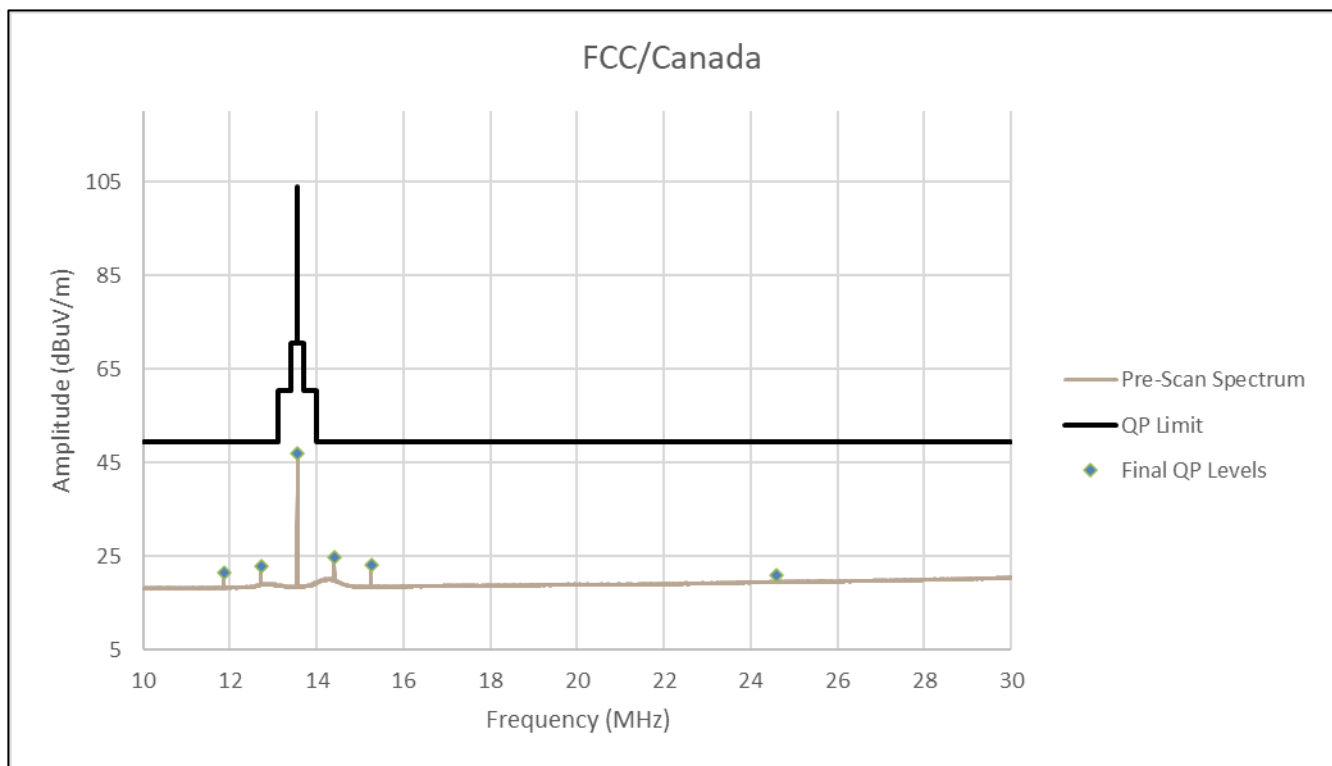


Figure RE18.1: Spectral data

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.

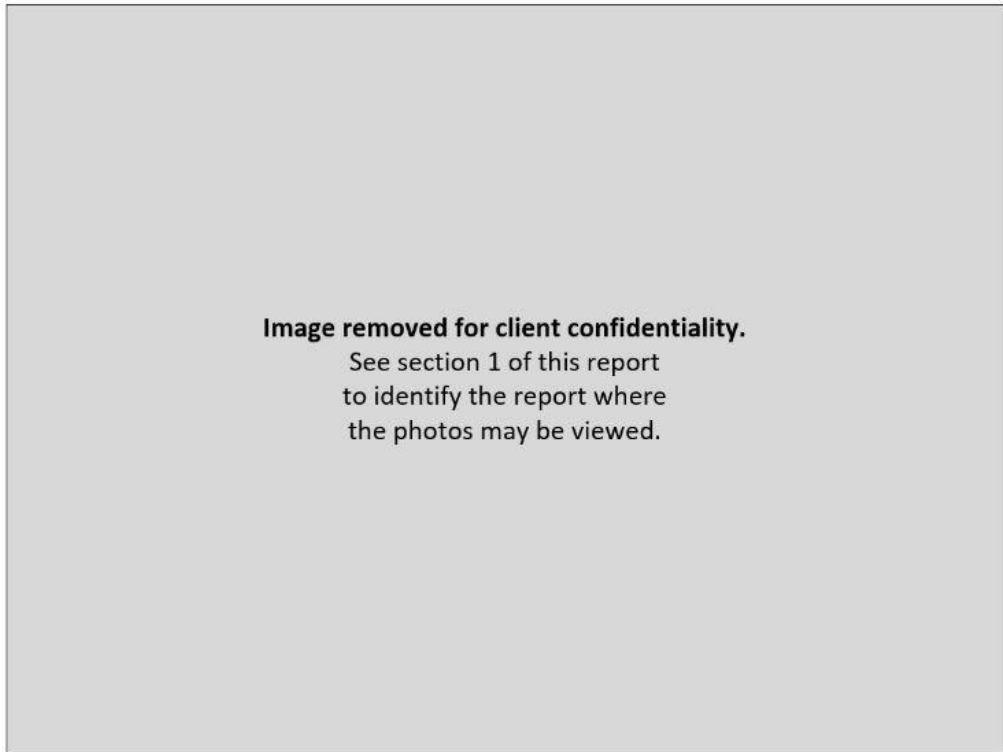


Figure RE18.2: EUT test setup, front view (Antenna X Orientation)

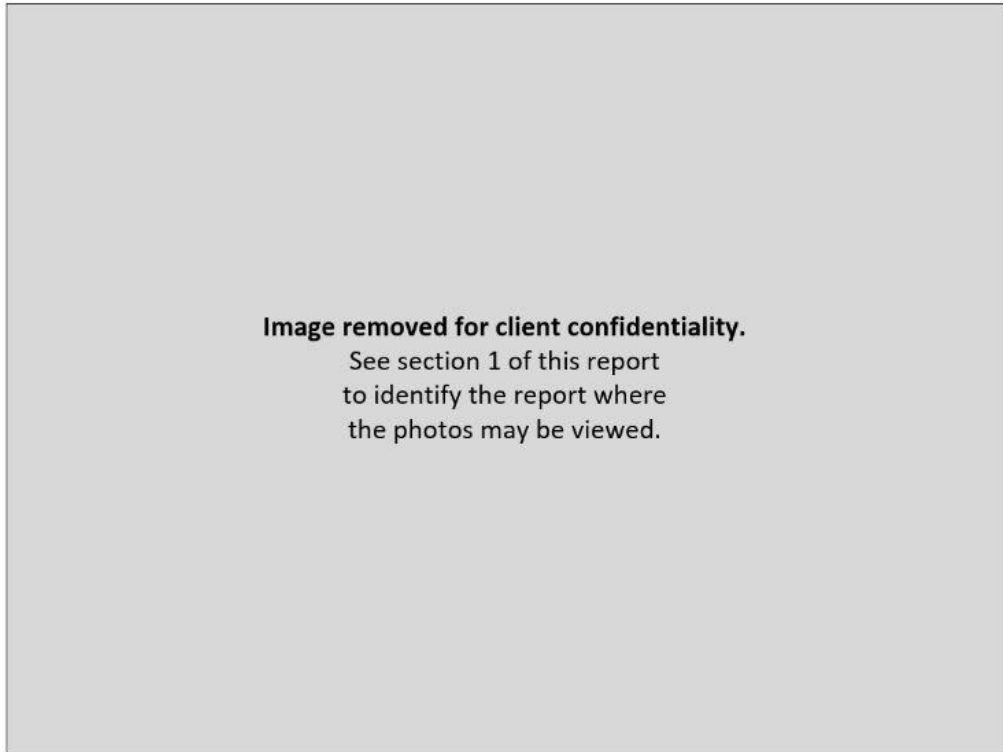


Figure RE18.3: EUT test setup, reverse view (Antenna X Orientation)

Image removed for client confidentiality.
See section 1 of this report
to identify the report where
the photos may be viewed.

Figure RE18.4: EUT test setup, front view (Antenna Y Orientation)

Image removed for client confidentiality.
See section 1 of this report
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the photos may be viewed.

Figure RE18.5: EUT test setup, reverse view (Antenna Y Orientation)

This line is the end of the test record.

Test Record
Radiated Emission Test RE19
Project GCL0463

Test Date(s) 21 May 2024
Test Personnel David Kerr

Product Model A04884
Serial Number tested 8LY000163

Operating Mode M16 (NFCTag) Mode B
Arrangement A7 NFCu
Input Power Battery

Test Standards: FCC Part 15, ANSI C63.10, RSS-210 (as noted in Section 6 of the report).

Frequency Range: 10 MHz to 30 MHz

Pass/Fail Judgment: PASS

Test record created by: David A Kerr
Date of this record: 21 May 2024

Original record, Version A.

Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	1-Oct-2024
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Table RE19.1: Test Equipment Used

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Frequency (MHz)	Limit (dBuV/m)	Limit (dBuA/m)	Measured (dBuV/m)	Measured (dBuA/m)	Margin (dB)	Azimuth (degree)	Height (mm)	Antenna Orientation
11.865	49.5	-2.0	21.6	-29.9	27.9	116	1500	X
12.714	49.5	-2.0	22.9	-28.6	26.6	109	1500	X
13.560	104.0	52.5	47.5	-4.0	56.5	96	1500	X
14.408	49.5	-2.0	25.1	-26.4	24.4	89	1500	X
15.256	49.5	-2.0	23.4	-28.1	26.1	82	1500	X
28.941	49.5	-2.0	21.4	-30.1	28.1	20	1500	X

Table RE019.2: Emission summary

The graph below shows the background spectrum observed during pre-scan, as well as the final data points from the tables above.

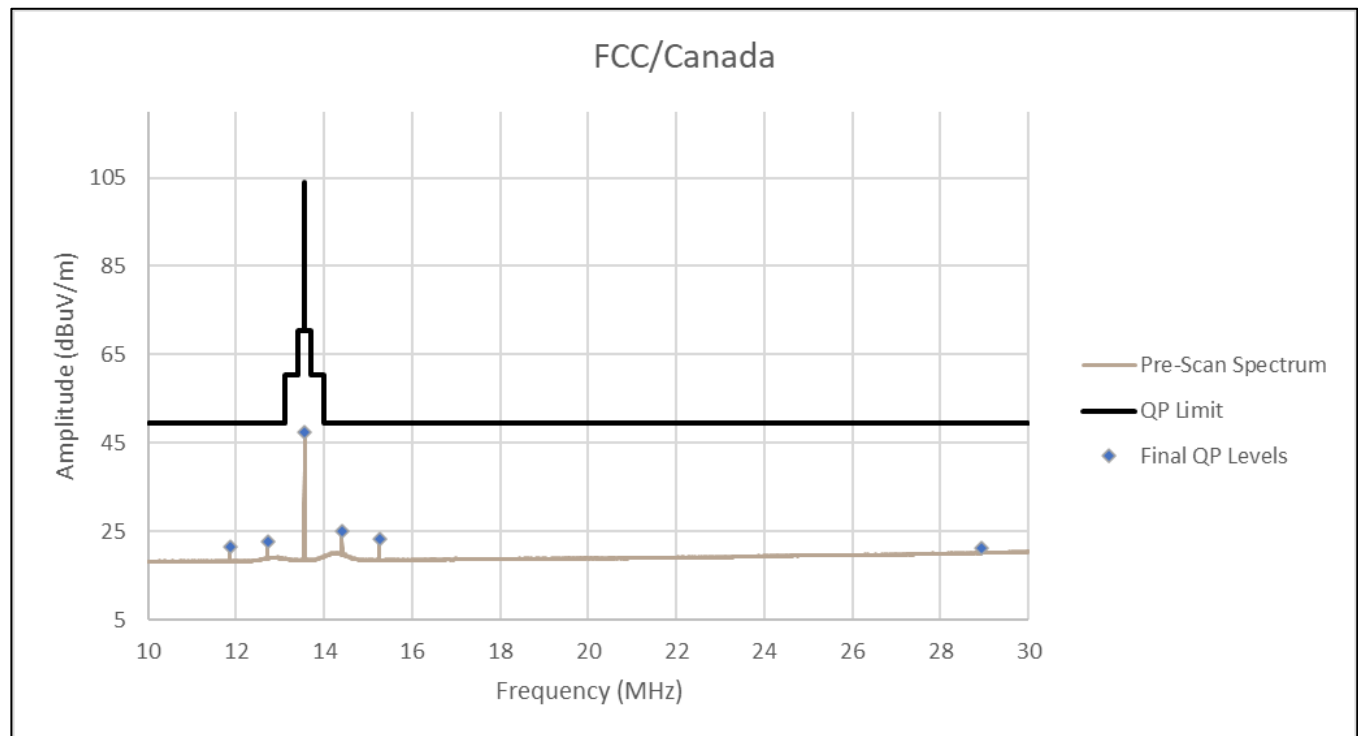


Figure RE19.1: Spectral data

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.

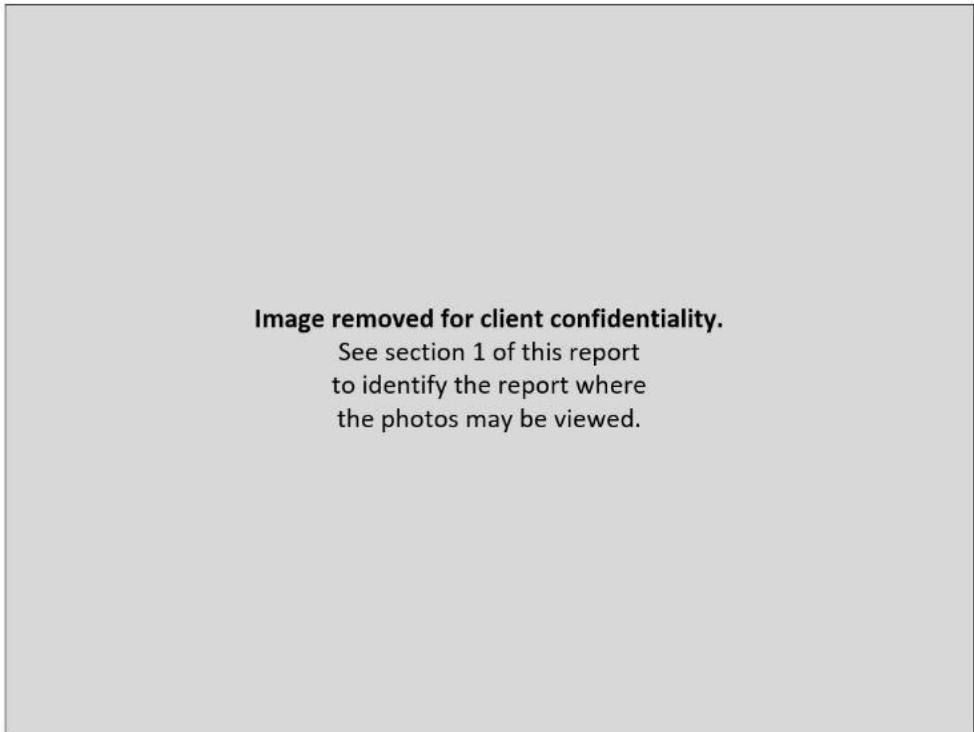


Figure RE19.2: EUT test setup, front view (Antenna X Orientation)

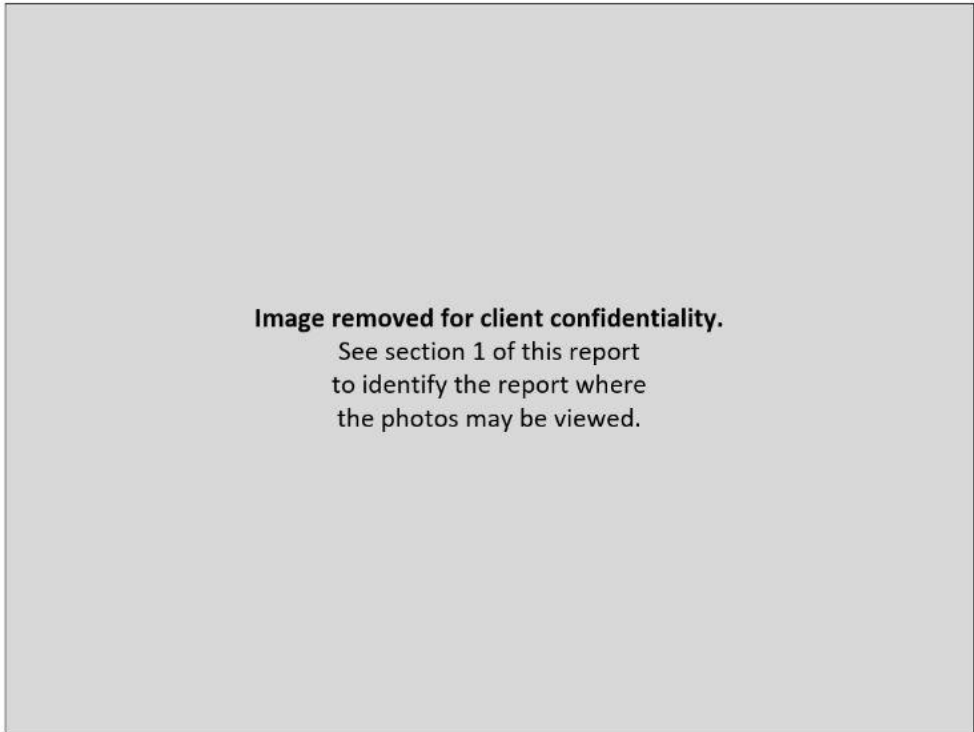


Figure RE19.3: EUT test setup, reverse view (Antenna X Orientation)

This line is the end of the test record.

Test Record

Radiated Emission Test RE20

Project GCL0463

Test Date(s) 22 May 2024
Test Personnel David Kerr, Jim Solum

Product Model A04884
Serial Number tested 8LY000163

Operating Mode M16 (NFCTag) Mode B
Arrangement A7 NFCu
Input Power Battery

Test Standards: FCC Part 15, ANSI C63.10, RSS-210 (as noted in Section 6 of the report).

Frequency Range: 30 MHz to 1000 MHz

Pass/Fail Judgment: PASS

Test record created by: David A Kerr, Jim Solum
Date of this record: 23 May 2024

Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 26 GHz	Keysight	N9048B	MY59290135	27-Sep-2023	1-Oct-2024
Antenna, Biconilog, 30M-6 GHz	ETS Lindgren	3142E	233204	2-Nov-2023	1-Nov-2025
SAC 3m, below 1 GHz	Frankonia	SAC3	F199004	7-Nov-2022	7-Nov-2025
Tape measure, 1" x 33'	Lufkin	PHV1410CMEN	10720	16-Jan-2023	15-Jan-2026

Table RE20.1: Test Equipment Used

Software Used: Keysight PXE software A.32.06, RE Signal Maximization Tool v2023Jul14.xlsx

Test Data

The radiated emission test process began with a preliminary scan at multiple turntable angles, antenna heights, and both antenna polarizations. For test standards that require reorienting the test sample, further preliminary scans were taken in those alternate orientations typically described as X, Y, and Z. Subsequent testing was done using on the orientation(s) producing the highest result relative to the test limit. Where the test standard requires cable manipulation, this was done at one of more likely worst case frequencies selected by the test personnel while observing the receiver display. At each of the frequencies selected for final measurements, the turntable angle, antenna height, and antenna polarization were explored to find the worst-case settings. Final field strength measurements were taken in that set of positions. Full maximization was not performed at frequencies that are noise floor measurements included per the test standard requirements.

At azimuth angle 0° the 'front' reference mark of the turntable is pointed Southward. At 90° the reference mark points West. At -90° it points East. At -7° the turntable reference mark is pointed directly at the antenna. The designation of the X, Y, and Z orientations of the test sample are sample dependent, so these are reported by use of photographs.

The table shows the selected final measurement data between 30 MHz and 150 MHz. It includes at least the six strongest emissions observed relative to the test limit, along with other data points of interest. Where a data point is highlighted is yellow, this is an aid to indicate the data point(s) with the least margin to the test limit. A positive

margin value indicates that the emission was below the test limit. The test limit is the FCC Class B Limit at 3m. Any unintentional radio emission limits are not applied to intentional radio signals.

Frequency (MHz)	Limit (dBuV/m)	Measured (dBuV/m)	Margin (dB)	Azimuth (degree)	Height (mm)	Antenna Polarity
40.680	40.0	22.4	17.6	-187	1205	VERT
66.090	40.0	17.8	22.2	-48	1065	VERT
67.800	40.0	23.4	16.6	144	1478	VERT
94.920	43.5	21.5	22.0	-184	1140	VERT
122.040	43.5	20.5	23.0	-9	1127	VERT
149.160	43.5	22.4	21.1	-36	1028	VERT

Table RE20.2: Emission summary

The graph below shows the background spectrum observed during pre-scan, as well as the final data points from the table above.

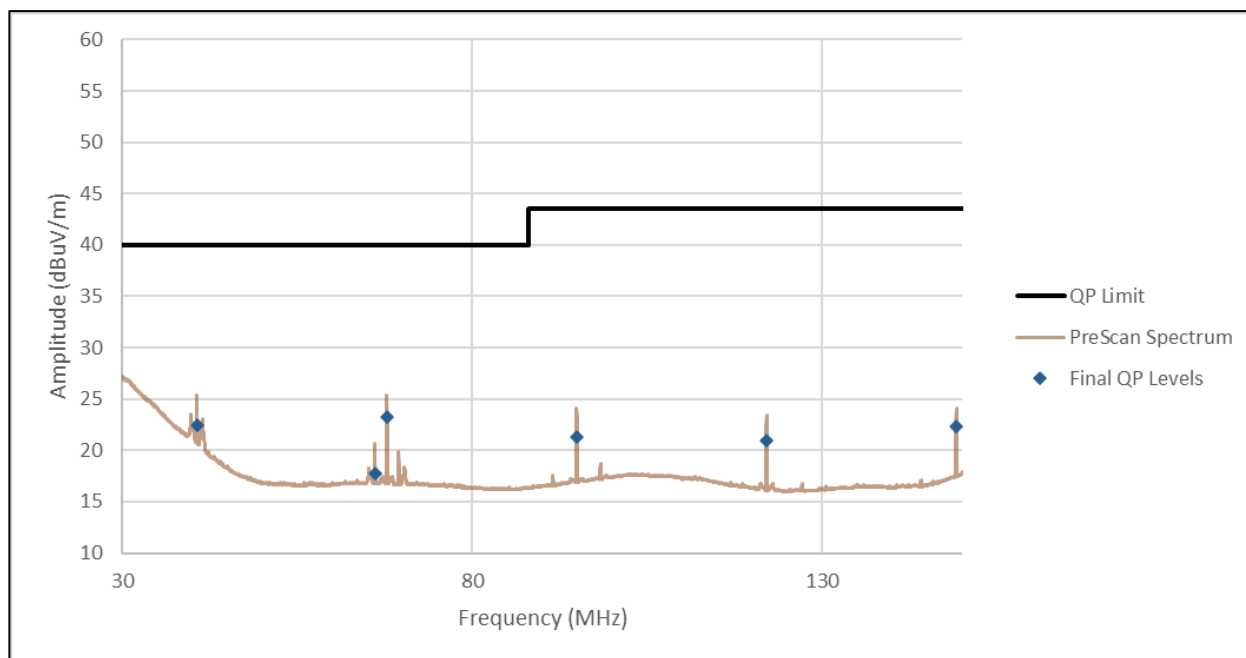


Figure RE20.1: Spectral data

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.



Figure RE20.2: EUT test setup, front view



Figure RE20.3: EUT test setup, reverse view

This line is the end of the test record.

Test Record

Conducted Emissions Mains Test CE04

Project GCL0463

Test Date(s) 17 May 2024
Test Personnel Aditya Prakash

Product Model A04884
Serial Number tested 8LY000163

Operating Mode M12 (NFCRdr)
Arrangement A2 (Upwr)
Input Power 120 V_{AC} 60 Hz

Test Standards: FCC Part 15, ANSI C63.10, RSS-210 (as noted in Section 6 of the report).

Frequency Range: 150 kHz to 30 MHz

Pass/Fail Judgment: PASS

Test record created by: Andy Heier, Aditya Prakash

Date of this record: 23 May 2024

Original record, Version A.

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 44GHz	Keysight	N9048B	MY62220139	13-Mar-2024	15-Mar-2025
LISN multiline; 15A to 9kHz	Com-Power	LI-215A	192027	19-Feb-2024	15-Feb-2027

Table CE04.1: Test Equipment Used

Software Used

Keysight PXE software A.33.03; CE Mains 150kHz to 30M Data Analysis V2 2021Jun10.xlsx

Test Data

The conducted emission test process began with a set of preliminary scans on both power conductors using both Quasi-Peak and Average detectors across the frequency range. Where the test standard requires cable manipulation, one or more likely worst case frequencies selected by the test personnel. Cables were manipulated to find the maximal signal strength while observing the receiver levels at those selected frequencies. At each of the frequencies selected for final measurements, Quasi-peak and Average detector readings were taken on each conductor.

The table shows the selected final measurement data. It includes at least the six strongest emissions observed relative to the limit lines, along with other data points of interest. The yellow highlight indicate the data points with the least margin to the quasi-peak detector limit and the average detector limit. A positive margin value indicates that the emission was below the test limit. The test limit is the Composite FCC/CISPR Class B Limit.

The table below includes the data for the intentional transmitter at 13.56 MHz which is not subject to the unintentional limits.

Frequency (kHz)	QP Limit (dBuV)	AV Limit (dBuV)	L1 QP (dBuV)	L2 QP (dBuV)	L1 AV (dBuV)	L2 AV (dBuV)	QP Margin (dB)	AV Margin (dB)
3428	56.00	46.00	40.44	37.21	37.91	35.57	15.56	8.09
6857	60.00	50.00	29.05	26.98	26.47	24.18	30.95	23.53
10286	60.00	50.00	40.03	37.29	37.52	35.56	19.97	12.48
13560	N/A	N/A	58.54	55.51	55.84	52.91	N/A	N/A
16989	60.00	50.00	35.53	33.38	33.45	31.96	24.47	16.55
20571	60.00	50.00	33.25	31.51	31.43	30.10	26.75	18.57
24000	60.00	50.00	37.81	35.60	35.86	34.55	22.19	14.14
27429	60.00	50.00	33.13	31.15	31.34	30.00	26.87	18.66

Table CE04.2: Emission summary (NFC)

The graph below shows preliminary scan data as continuous curves. Superimposed are the final measurement data points reported in the table above.

The graph below includes the data for the intentional transmitter at 13.56 MHz which is not subject to the unintentional limits.

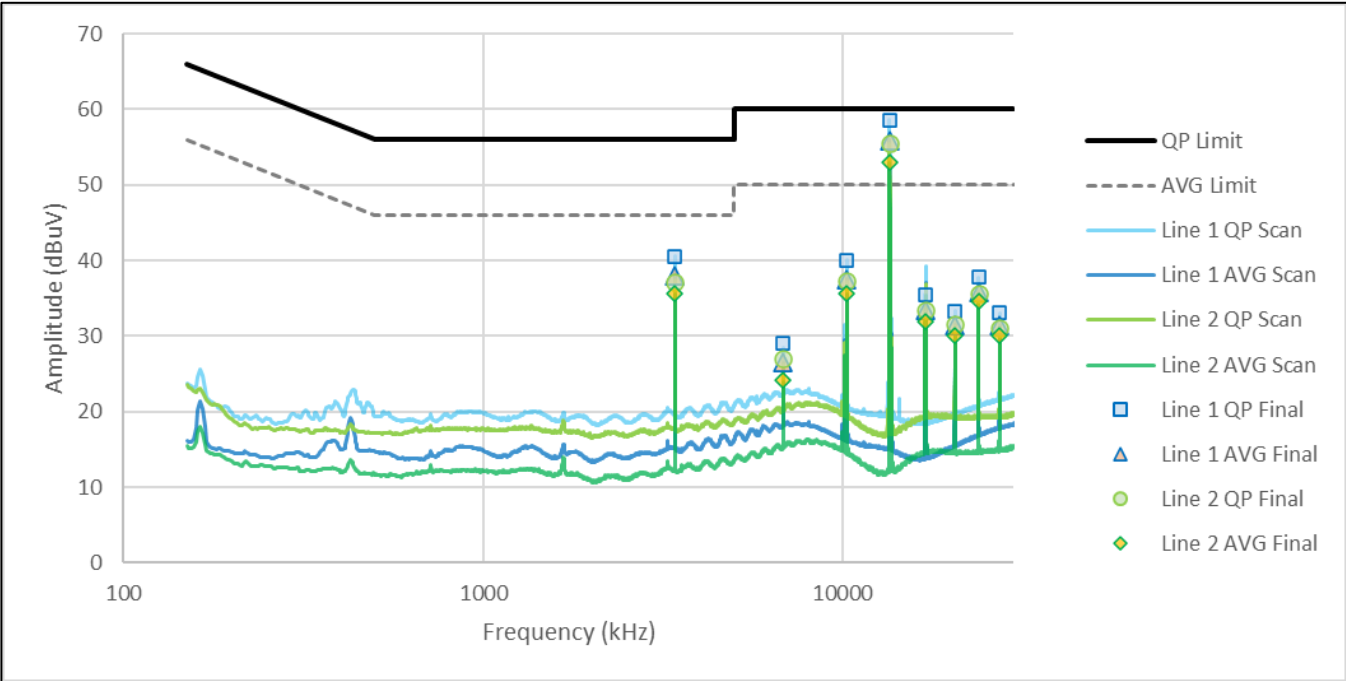


Figure CE04.1: Spectral data (NFC)

Setup Photographs

The following photographs show the EUT configured and arranged in the manner in which it was measured.

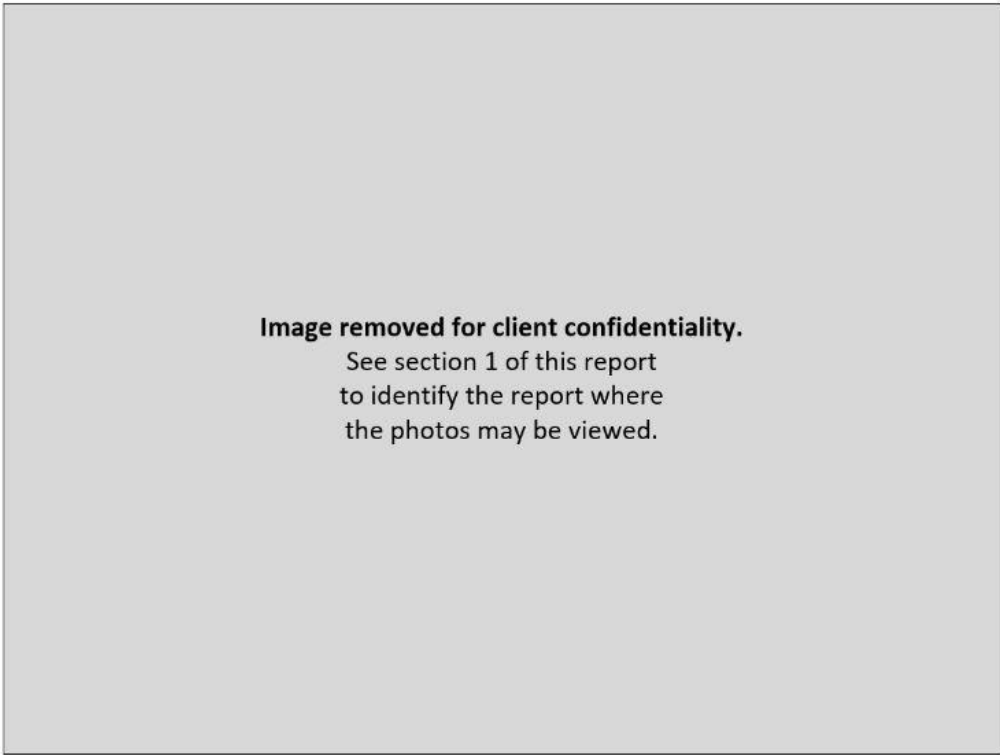


Figure CE04.2: Test setup, front view

Image removed for client confidentiality.

See section 1 of this report
to identify the report where
the photos may be viewed.

Figure CE04.3: Test setup, side view

This line is the end of the test record.

Test Record
Transmitter Stability in Extreme Conditions
Test IDs TR45
Project GCL-0463

Test Date(s) 12 Jun 2024
Test Personnel Majid Farah assisted by Vladimir Tolstik

Product Model A04884
Serial Number tested 8LY000163

Operating Mode M12 (NFCRdr)
Arrangement A3 (Udc)
Nominal Input Power USB 5 Vdc

Test Standards: FCC part 15, RSS-GEN, RSS-210, ANSI C63.10 (as noted in Section 6 of the report)

Radio Protocol NFC

Pass/Fail Judgment: PASS

Test record created by: Jim Solum
Date this record: 17 Jun 2024

Original record, Version A.

Test Equipment

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
MXE Receiver 8.4 GHz	Keysight	N9038B	MY63460112	28-Feb-2024	1-Mar-2025
DMM Multimeter	FLUKE	79 III	71740743	11-Apr-2024	11-Apr-2027
Thermometer	Thermco	ACCD370P	210607316	21-Sep-2023	15-Sep-2024
Thermal Chamber	Tenney	T2RC	32774-02	Calibration	Not Required
Near Field Probe Set	Com-Power	PS-400	151544	Calibration	Not Required

Table TR45.1: Equipment used

Software Used: PXE Software Revision A.33.03, FrequencyStabilityAnalysistemplateV1.xlsx

Test Method

The standards cited require observation of the stability for transmission frequency and/or power at certain environmental extremes. The reference is performance on nominal input voltage and a temperature of 20 °C. Where the standards cited here impose different limits or conditions, the most stringent limits and conditions have been applied.

The Standard indicated carrier frequency stability shall not exceed 0.01% of operation frequency. The frequency was required to remain between the limits of 13.558644 and 13.561356 MHz.

The modes utilized include those that showed emissions closest to the band edge during prior bandwidth testing.

Test Data

The test sample(s) were subjected to extreme conditions and performed as shown below. During NFC test mode, each measurement was made conducted from a near field probe located at a close distance to the sample.

Yellow highlights indicate the maximum and minimum measured carrier frequency. The maximum frequency measured was 13,560,129 Hz and the minimum was 13,560,035 Hz. The margin to high side of limit is 1227 Hz and margin for low side of the limit is 1391 Hz.

Tx Mode	Temp	Volts	NFC carrier frequency (Hz)			
			Time interval (minutes)			
			0	2	5	10
NFC	50	5	13,560,035	13,560,046	13,560,060	13,560,074
NFC	40	5	13,560,041	13,560,043	13,560,048	13,560,076
NFC	30	5	13,560,036	13,560,035	13,560,035	13,560,036
NFC	20	5	13,560,040	13,560,039	13,560,041	13,560,042
NFC	20	4.25	13,560,042	N/A	N/A	N/A
NFC	20	5.75	13,560,042	N/A	N/A	N/A
NFC	10	5	13,560,106	13,560,086	13,560,072	13,560,062
NFC	0	5	13,560,102	13,560,096	13,560,093	13,560,090
NFC	-10	5	13,560,129	13,560,123	13,560,116	13,560,109
NFC	-20	5	13,560,124	13,560,129	13,560,129	13,560,128

Table TR45.2: Carrier frequency measurement for NFC transmission during temperature and voltage variations

Setup Block Diagram

The following block diagrams show the EUT configured and arranged in the manner which it was measured.

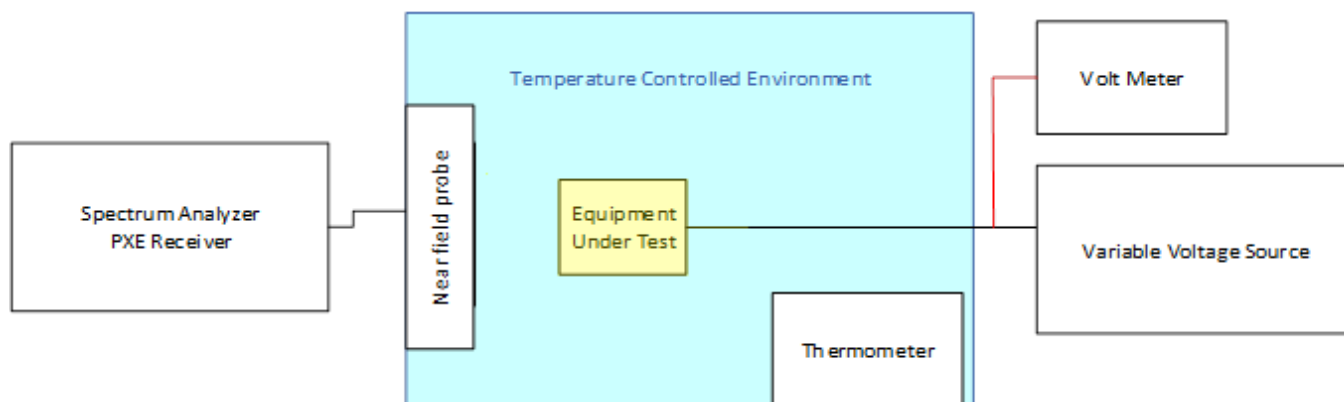


Figure TR45.1: Schematic drawing of the test equipment setup for NFC

This line is the end of the test record.

Test Record
Transmitter Bandwidth Tests
Test IDs TR13
Project GCL0463

Test Date(s) 23 May 2024
Test Personnel Majid Farah

Product Model A04884
Serial Number tested 8LY000159

Operating Mode M12 (NFCRdr)
Arrangement A4 (Udc)
Input Power USB 5 Vdc

Test Standards: FCC Part 15, ANSI C63.10, RSS-GEN (as noted in Section 6 of the report).

Radio Protocol NFC
Radio Band 13.4 MHz to 13.8 MHz

Pass/Fail Judgment: PASS

Test record created by: Aditya Prakash
Date of this record: 28 May 2024
Original record, Version A.

Test Equipment Used

Description	Make	Model #	Serial #	Last Cal/Ver	Next Due
PXE Receiver 44GHz	Keysight	N9048B	MY62220139	13-Mar-2024	15-Mar-2025

Table TR13.1: List of test equipment used

Test Software Used: Keysight PXE firmware A.33.03

Test Method

During this test the transmitter output is fed directly, or through RF attenuators, to the spectrum analyzer. The analyzer has a built-in capability to identify the minimum bandwidth that contains a specified portion of the total power observed, and also identify parameters such as the edge frequencies for that bandwidth and the center frequency error. The spectrum is scanned many times so that the varied effects of modulation are appropriately assessed. Since the focus is on the relative distribution of energy across a range of frequencies, the absolute amplitudes recorded during this test are not relevant and may not include cable losses or attenuation factors.

Test Setup

This block diagram shows the test equipment setup.

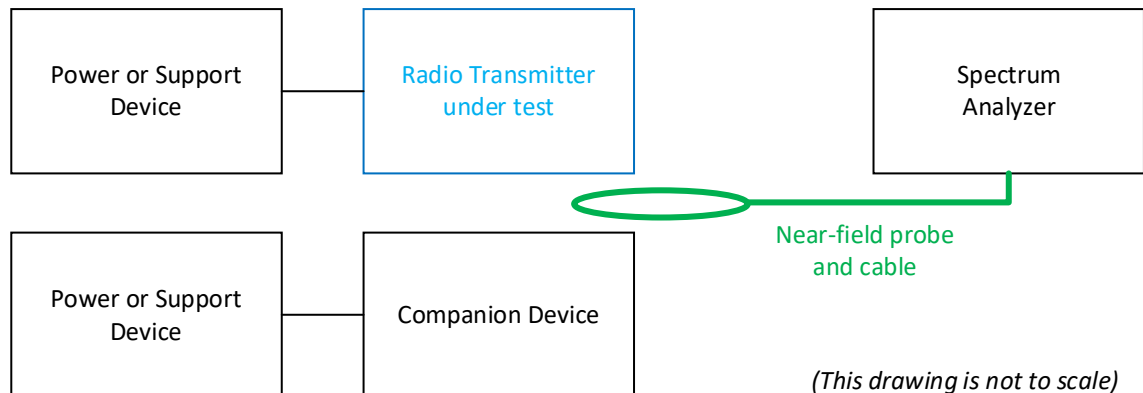


Figure TR13.1: Test setup

Test Data

The data for each test is summarized below, followed by the spectral data for each case highlighted in yellow.

The analysis threshold for the Occupied Bandwidth test was the bandwidth containing 99% of the observed power. The standards cited do not limit the Occupied Bandwidth (OBW) for all transmitter types. In such cases an OBW limit stated below may be inapplicable. Instead, the distance from the edge of the occupied band to the edge of the allocated frequency band may be more pertinent.

	Bandwidth
NFC Mode	in MHz
Type A	2.1346
Type B	2.1677

Table TR13.2: Summary of bandwidth data in MHz for NFC modes



Figure TR13.2: Occupied bandwidth data for Type B transmissions

Necessary Bandwidth Calculations

The Necessary Bandwidth is a theoretical value based on the specifications for a communication protocol, rather than the hardware implementation and a subsequent lab measurement. The analysis methods in FCC Part 2.202 and TRC-43 are the same for NFC, Bluetooth, ANT, and IEEE 802.11b WiFi. However, they differ for IEEE 802.11g and 11n systems because the Canadian TRC-43 standard provides different analysis methods for Orthogonal Frequency Division Multiplexing systems (OFDM). The tables below will show the analysis for most of the radios signals as a combined approach, then separately analyze the results for IEEE 802.11g and n systems. The tables below may include radio protocols that are not part of the product being evaluated.

NFC (Near Field Communication) at 13.56 MHz uses continuous wave telegraphy without tone modulation. The bit rate 'B' in the FCC and TRC equations is split into two parts here. B is the baud rate. C is a coding factor. C=1 for Miller encoding where the transition speed is as high as the bit rate, or C=2 for Manchester encoding where the transition speed is as high as twice the bit rate). K is a factor set to 3 for non-fading circuits under the standards. The Necessary Bandwidth, B_N is then:

$$B_N = BCK$$

Radio Type	B (kbaud)	C	K	B_N (kHz)
NFC A	106	1	3	318.0
NFC B	212	2	3	1272.0
NFC B	424	2	3	2544.0

Table TR13.100: Necessary Bandwidth for NFC

The radio modulation schemes for Ant, for the various Bluetooth protocols, and for IEEE 802.11 b WiFi are a mix of Phase Shift Key (PSK) and Quadrature Amplitude Modulation (QAM) techniques. The Necessary Bandwidth calculations use the equations from 47CFR Part 2.202(g) table section 6. We have set the variable K=1, which leaves the equation for both PSK and QAM as:

$$B_N = 2R / \log_2(S)$$

where B_N is the Necessary Bandwidth, R is the bit rate, and S is the number of signaling states.

Radio Type	R Mbps	K	S	LogBase2 of (S)	B _N (MHz)
ANT / ANT+	1	1	2	1	2

Table TR13.101: Necessary Bandwidth for ANT and ANT+ Radio Protocols (FCC and TRC-43)

Radio Type	Sub-type	Method	R Mbps	K	S	LogBase2 of (S)	B _N (MHz)
Bluetooth	BR	GFSK	1	1	2	1	2
	EDR2	Pi/4 DPSK	2	1	4	2	2
	EDR3	8DPSK	3	1	8	3	2
BLE	1Mbps	GFSK	1	1	2	1	2
	2Mbps	DQPSK	2	1	4	2	2

Table TR13.102: Necessary Bandwidth for Bluetooth Radio Protocols (FCC and TRC-43)

Radio Type	Sub-type	R Mbps	K	S	LogBase2 of (S)	B _N (MHz)
802.11 b	1	1	1	2	1	2
	2	2	1	4	2	2
	5.5	5.5	1	4	2	5.5
	11	11	1	4	2	11

Table TR13.103: Necessary Bandwidth for IEEE 802.11 b Radio Protocol (FCC and TRC-43)

Radio Type	Sub-type	R Mbps	K	S	LogBase2 of (S)	B _N (MHz)
802.11 a/g	6	6	1	2	1	12
	9	9	1	2	1	18
	12	12	1	4	2	12
	18	18	1	4	2	18
	24	24	1	16	4	12
	36	36	1	16	4	18
	48	48	1	64	6	16
	54	54	1	64	6	18
802.11 n/ac	MCS0	7.2	1	2	1	14.4
	MCS1	14.4	1	4	2	14.4
	MCS2	21.7	1	4	2	21.7
	MCS3	28.9	1	16	4	14.5
	MCS4	43.3	1	16	4	21.7
	MCS5	57.8	1	64	6	19.3
	MCS6	65	1	64	6	21.7
	MCS7	72.2	1	64	6	24.1
	MCS8	86.7	1	256	8	21.7

Table TR13.104: Necessary Bandwidth for IEEE 802.11 a, g, n, and ac 20 MHz Radio Protocols (FCC)

Radio Type	Sub-type	R Mbps	K	S	LogBase2 of (S)	B _N (MHz)
802.11 n/ac	MCS0	15	1	2	1	30.0
	MCS1	30	1	4	2	30.0
	MCS2	45	1	4	2	45.0
	MCS3	60	1	16	4	30.0
	MCS4	90	1	16	4	45.0
	MCS5	120	1	64	6	40.0
	MCS6	135	1	64	6	45.0
	MCS7	150	1	64	6	50.0
	MCS8	180	1	256	8	45.0
	MCS9	200	1	256	8	50.0

Table TR13.105: Necessary Bandwidth for IEEE 802.11 n and ac 40 MHz Radio Protocols (FCC)

As a note, the bit rate for IEEE 802.11 n or ac WiFi is calculated based on the IEEE standard's short guard interval of 400 nsec. If only the long guard interval of 800 nsec were implemented, the bit rates would decrease by a small amount.

The TRC-43 method for OFDM signals simply multiplies the number of subcarriers, K, and the subcarrier spacing, N_s. In both cases, N_s is 312.5 kHz. The count of subcarriers includes nulls. So for example, 802.11 n uses 4 pilot subcarriers, 52 data subcarriers, and one null suppressed subcarrier in the middle for 57 total subcarrier channels.

$$B_N = N_s * K$$

Radio Type	Mode	N _s (MHz)	K	B _N (MHz)
802.11a/g	20 MHz	0.3125	53	16.6
802.11n/ac	20 MHz	0.3125	57	17.8
802.11n/ac	40 MHz	0.3125	117	36.6

Table TR13.106: Necessary Bandwidth for IEEE 802.11 a, g, n, and ac Radio Protocols (TRC-43)

This line is the end of the test record.