

Code of Federal Regulations 47 Part 15 – Radio Frequency Devices

Subpart C – Intentional Radiators

Section 15.231

Periodic operation in the band 40.66 - 40.70 MHz
and above 70 MHz

THE FOLLOWING **MEETS** THE ABOVE TEST SPECIFICATION

FCC ID: KXU-UCTX

Formal Name: Umbilical Cord Infant Transmitter

Kind of Equipment: Wireless Infant Security Device

Frequency Range: **318 MHz (in this report)** and 262 kHz (see report #24384)

Test Configuration: Body-worn, battery operated device tested in three orthogonal positions.

Model Number(s): 9450-8262

Model(s) Tested: 9450-8262

Serial Number(s): Test Sample P1 – normal operation
Test Sample FCC1 – FCC test firmware

Date of Tests: March 6th, 2019

Test Conducted For: RF Technologies, Inc.
3125 North 126th Street
Brookfield, WI 53005

NOTICE: “This test report relates only to the items tested and must not be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government”. Please see the "Description of Test Sample" page listed inside of this report.

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166 South Carter, Genoa City, WI 53128

Company:
Model Tested:
Report Number:
Project Number:

RF Technologies, Inc.
9450-8262
24382
10147

SIGNATURE PAGE

Report By:

Craig Brandt
Test Engineer

Reviewed By:

William Stumpf
OATS Manager

Approved By:

Brian Mattson
General Manager



166 South Carter, Genoa City, WI 53128

Company:	RF Technologies, Inc.
Model Tested:	9450-8262
Report Number:	24382
Project Number:	10147

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United States Department of Commerce
National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2005

NVLAP LAB CODE: 100276-0

D.L.S. Electronic Systems, Inc.
Wheeling, IL

*is accredited by the National Voluntary Laboratory Accreditation Program for specific services,
listed on the Scope of Accreditation, for:*

Electromagnetic Compatibility & Telecommunications

*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005.
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality
management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).*

2018-09-19 through 2019-09-30
Effective Dates



[Signature]
For the National Voluntary Laboratory Accreditation Program

**ELECTROMAGNETIC
COMPATIBILITY &
TELECOMMUNICATIONS**

NVLAP LAB CODE 100276-0

Emissions

Designation

Off-site test location

Description

D.L.S. Electronics performs radiated emissions testing at an additional location, 166 South Carter Street, Genoa City, WI 53128.

1.0 Summary of Test Report

It was determined that the Umbilical Cord Infant Transmitter, Model 9450-8262, complies with the requirements of CFR 47 Part 15 Subpart C Section 15.231.

Subpart C Applicable Technical Requirements Tested:

Section	Description	Procedure	Note	Compliant?
15.231(c)	20 dB Emission Bandwidth	ANSI C63.10-2013	2	Yes
15.231(a)(2)	Transmission Deactivation	ANSI C63.10-2013	2	Yes
15.231(a)(3)	Periodic Transmissions	ANSI C63.10-2013	2	Yes
15.231(b)	Field Strength of Emissions - Fundamental and Spurious -	ANSI C63.10-2013	1,2	Yes
15.35(c)	Duty Cycle Correction for Pulsed operation	ANSI C63.10-2013	2	Informative

Note 1: Tested in 3 orthogonal planes.

Note 2: Radiated emission measurement.

2.0 Introduction

On March 6th, 2019 the Umbilical Cord Infant Transmitter, Model 9450-8262, as provided from RF Technologies, Inc. was tested to the requirements of CFR 47 Part 15 Subpart C Section 15.231. To meet these requirements, the procedures contained within this report were performed by personnel of D.L.S Electronic Systems, Inc.



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3.0 Test Facilities

D.L.S. Electronic Systems, Inc. is a full service EMC/Safety Testing Laboratory accredited to ISO 17025. NVLAP Certificate and Scope can be viewed at <http://www.dlsemc.com/certificate>. Our facilities are registered with the FCC, ISED Canada, and VCCI.

Wisconsin Test Facility:

D.L.S. Electronic Systems, Inc.
166 S. Carter Street
Genoa City, Wisconsin 53128

Wheeling Test Facility:

D.L.S. Electronic Systems, Inc.
1250 Peterson Drive
Wheeling, IL 60090

FCC Registration #90531

4.0 Description of Test Sample

Description:

The device is a wireless security device intended to prevent the abduction of an infant from a healthcare facility. The device is attached to the umbilical cord of an infant with an umbilical cord clamp. Once enabled, the device will periodically send status OK messages wirelessly on a 318 MHz signal to a central computer server which means the infant is within the safe boundary at the healthcare facility. The device also transmits wirelessly periodically at 262 KHz which will cause wireless receivers mounted, for example, at doors to indicate a security breach in the event the device is brought in close proximity to those receivers. The transmitters do not transmit simultaneously on 318 MHz and 262 KHz.

Type of Equipment / Frequency Range:

Body-Worn / 318 MHz and 262 kHz

Physical Dimensions of Equipment Under Test:

Length: 1.046 in. x Width: 1.101 in. x Height: 0.766 in.

4.0 Description of Test Sample (continued)

Power Source:

3.0 VDC Primary Lithium Coin Cell Battery

Internal Frequencies:

16.777216 MHz

Transmit Frequencies Used For Test Purpose:

318 MHz

Type of Modulation(s) / Antenna Type:

OOK / 318 MHz transmitter uses a short non-resonant strip on the circuit board

5.0 Test Equipment

A list of the equipment used can be found in the table below. All primary equipment was calibrated against known reference standards with a verified traceable path to NIST.

D.L.S. Wisconsin – Radiated Emissions 30-1000 MHz – Site 3 – Test Equipment:

Description	Manufacturer	Model Number	Serial Number	Frequency Range	Cal Dates	Cal Due Dates
Receiver	Rohde & Schwarz	ESI 26	837491/010	20 Hz-26 GHz	4-12-18	4-12-19
Antenna	EMCO	3104C	4849	20 MHz-200 MHz	8-23-18	8-23-20
Antenna	Electro-Metrics	LPA-25	1114	200 MHz-1 GHz	10-11-17	10-11-19
Cable	Beldin	9914	CBL-023	9 kHz-1 GHz	8-29-18	8-29-19
Cable	Beldin	9273	CBL-029	9 kHz-1 GHz	8-29-18	8-29-19
Cable	Manhattan/CDT	RG-223/U	CBL-052	9 kHz-1 GHz	8-29-18	8-29-19
Test Software	Rohde & Schwarz	ESK1	V1.7.1	N/A	N/A	N/A

D.L.S. Wisconsin – Radiated Emissions 1-3.2 GHz – Site G1 – Test Equipment:

Description	Manufacturer	Model Number	Serial Number	Frequency Range	Cal Dates	Cal Due Dates
Receiver	Rohde & Schwarz	ESI 40	837808/005	20 Hz-40 GHz	4-12-18	4-12-19
Horn Antenna	EMCO	3115	9903-5731	1 GHz-18 GHz	10-3-17	10-3-19
Cable	Micro-Coax	UFB311A	CBL-100	30 MHz-18 GHz	5-9-18	5-9-19
High Pass Filter	Q-Microwave	100460	2	1 GHz-18 GHz	6-4-18	6-4-19
Preamplifier	Ciao	CA118-4010	101	1 GHz-18 GHz	1-2-19	1-2-20
Test Software	Rohde & Schwarz	ESK1	V1.7.1	N/A	N/A	N/A

6.0 Test Arrangements

Radiated Emissions Measurement Arrangement:

All radiated emission measurements were performed at D.L.S. Electronic Systems, Inc. and set up according to ANSI C63.10-2013, unless otherwise noted. Description of procedures and measurements can be found in Section B – Measurement Data. See Section A for additional photos of the test set up. See Section C for measurement uncertainty.

Unless otherwise noted, the bandwidth of the measuring receiver / analyzer used during testing is shown below.

Frequency Range	Bandwidth (-6 dB)
10 to 150 kHz	200 Hz
150 kHz to 30 MHz	9 kHz
30 MHz to 1 GHz	120 kHz
Above 1 GHz	1 MHz

7.0 Test Conditions

Temperature and Humidity:

70°F at 18% RH

Battery Voltage:

3.0 Volts

8.0 Modifications Made To EUT For Compliance

None noted at time of test.



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9.0 Additional Descriptions

This device uses periodic transmissions for security or safety application as defined in FCC Part 15.231(a) (3) and does not exceed a total transmission time of two seconds per hour. Section B of this report shows data to confirm compliance with this rule section.

The EUT was programmed to transmit in a special test mode that allowed it to stay transmitting for one second, then off for three seconds, and then repeat that sequence continuously. For testing done in “normal operation mode” the EUT was programmed to use the largest duty cycle possible during normal operation.

10.0 FCC 15.31 (e) Supply Voltage Requirement statement

FCC 15.31 (e) - For intentional radiators, measurements of the variation of the input power or the radiated signal level of the fundamental frequency component of the emission, as appropriate, shall be performed with the supply voltage varied between 85% and 115% of the nominal rated supply voltage.

Compliance Statement: This device complies with the requirements of Part 15.31(e):

- ☒ This device is battery operated. All tests were performed using a new (or fully charged) battery.
- ☐ This device provides a constant regulated voltage to the RF circuitry regardless of supply voltage (see schematic diagrams).
- ☐ This device does not provide a constant regulated voltage to the RF circuitry regardless of supply voltage. Data has been supplied in this test report that supports compliance. Details:



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11.0 FCC 15.203 Antenna Requirement statement

SECTION 15.203 ANTENNA REQUIREMENT

An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device.... This requirement does not apply to carrier current devices or to devices operated under the provisions of Sections 15.211, 15.213, 15.217, 15.219, or 15.221.

Statement: This wireless device (Intentional Radiator) meets the requirements of FCC Part 15.203:

- ☒ The antenna is permanently attached
- ☐ The antenna has a unique coupling to the intentional radiator.
Description of coupling:
- ☐ This intentional radiator is professionally installed
- ☐ This intentional radiator, in accordance with Section 15.31(d), must be measured at the installation site.

12.0 Results

Measurements were performed in accordance with ANSI C63.10-2013. Graphical and tabular data can be found in Section B at the end of this report.

13.0 Conclusion

The Umbilical Cord Infant Transmitter, Model 9450-8262, as provided from RF Technologies, Inc., tested on March 6th, 2019 **meets** the requirements of CFR 47 Part 15 Subpart C Section 15.231.

Section A – Test Setup Photos

Photo Information and Test Setup:

Item: EUT – Umbilical Cord Infant Transmitter, Model 9450-8262

Radiated – Below 1 GHz – Position 1





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Section A

Radiated – Below 1 GHz – Position 2





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Company:	RF Technologies, Inc.
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Section A

Radiated – Below 1 GHz – Position 3



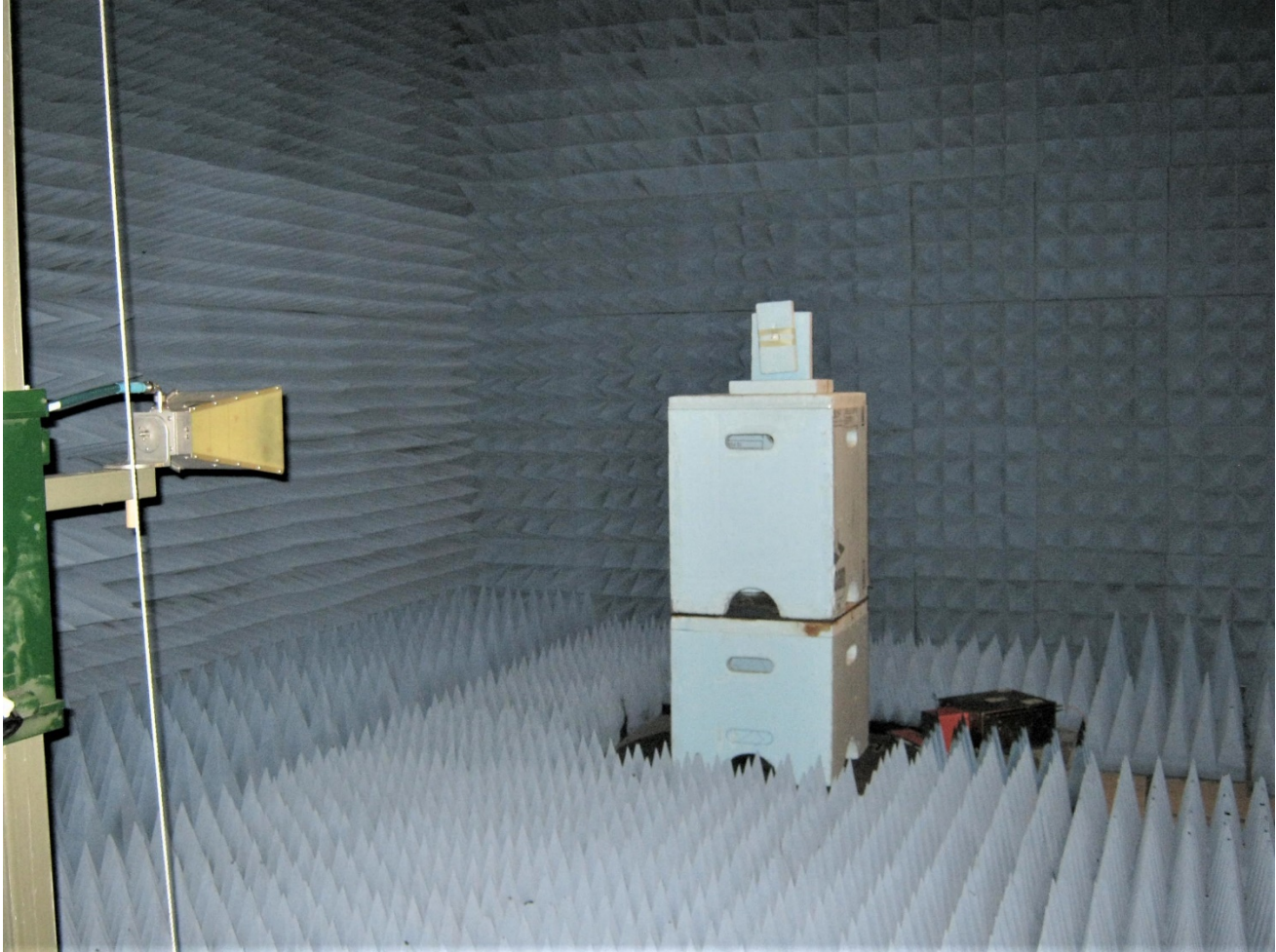


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Section A

Radiated – Above 1 GHz



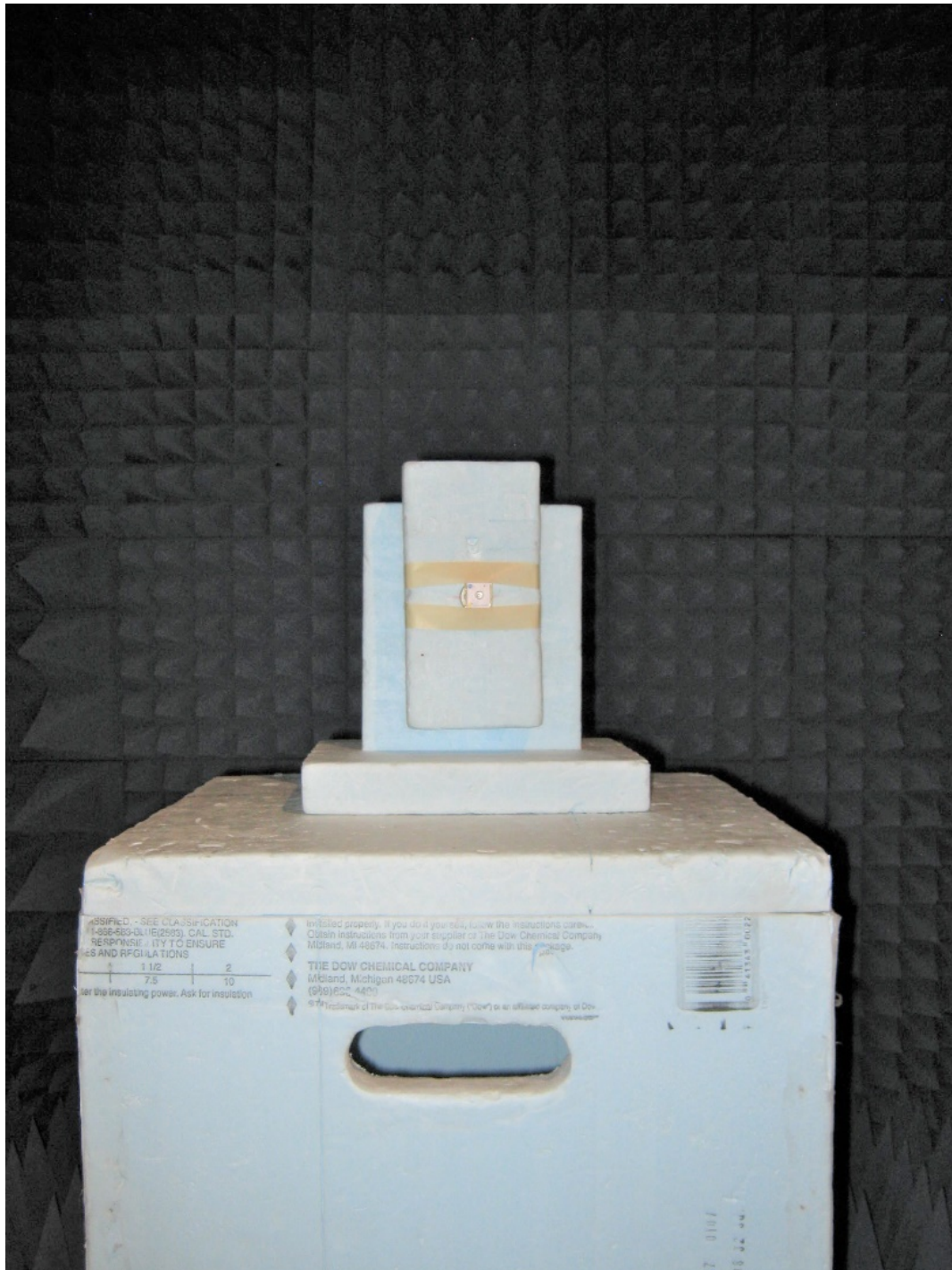


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Company:	RF Technologies, Inc.
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Section A

Radiated – Above 1 GHz – Position 1



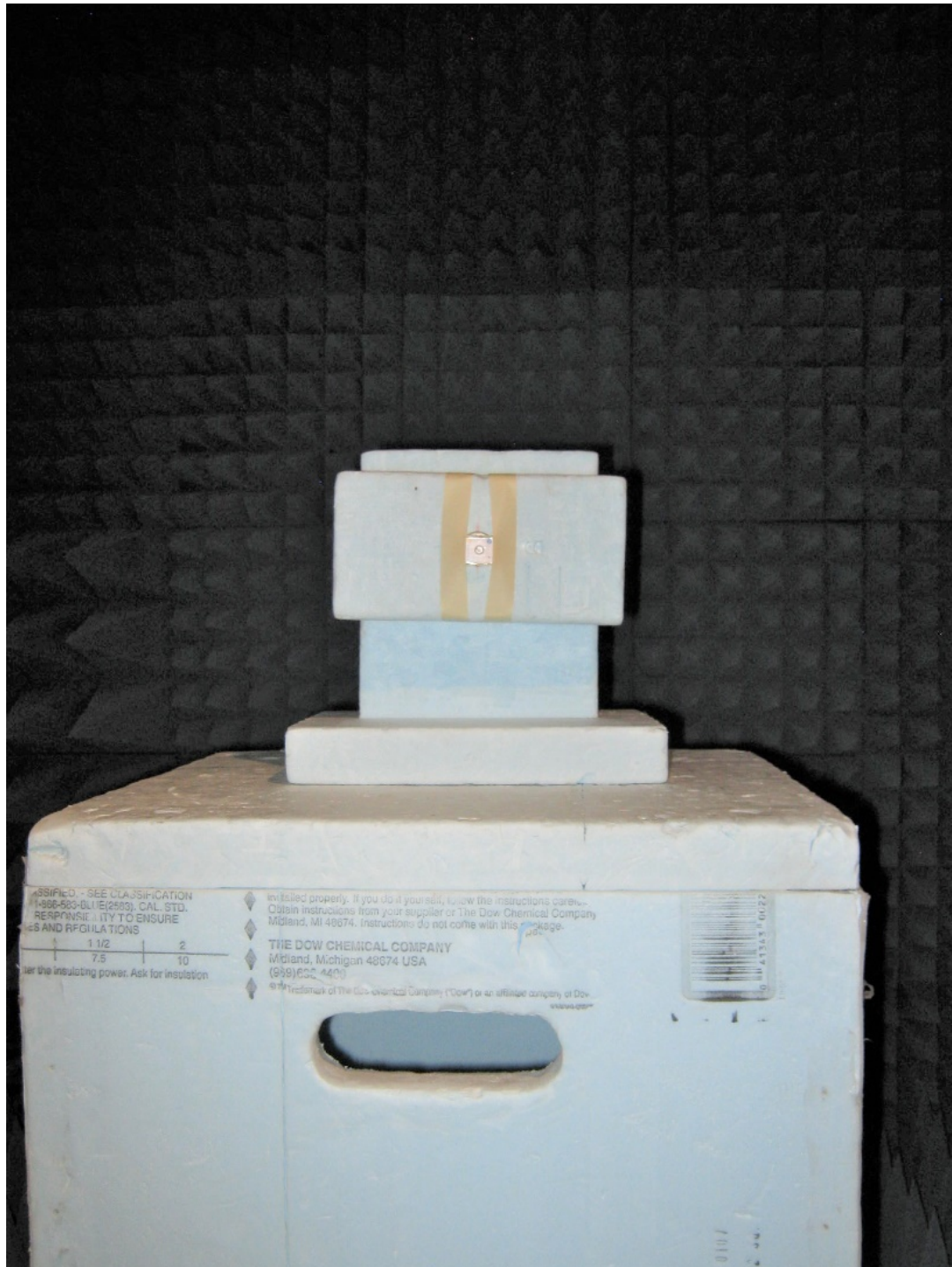


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Section A

Radiated – Above 1 GHz – Position 2





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Company:	RF Technologies, Inc.
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Section A

Radiated – Above 1 GHz – Position 3



Section B – Measurement Data

1.0 Emission Bandwidth – 20 dB

Rule Part:

Section 15.231 (c)

Test Procedure:

ANSI C63.10-2013

Limit:

Section 15.231 (c):

$318 \text{ MHz} \times 0.25\% = 795 \text{ kHz}$

Results:

Compliant
20 dB bandwidth: **336 Hz**

Sample Equation(s):

None

Notes:

This was a radiated emissions measurement. The maximum field strength of the emission was determined and the bandwidth was measured from the points at 20 dB down from the modulated carrier.



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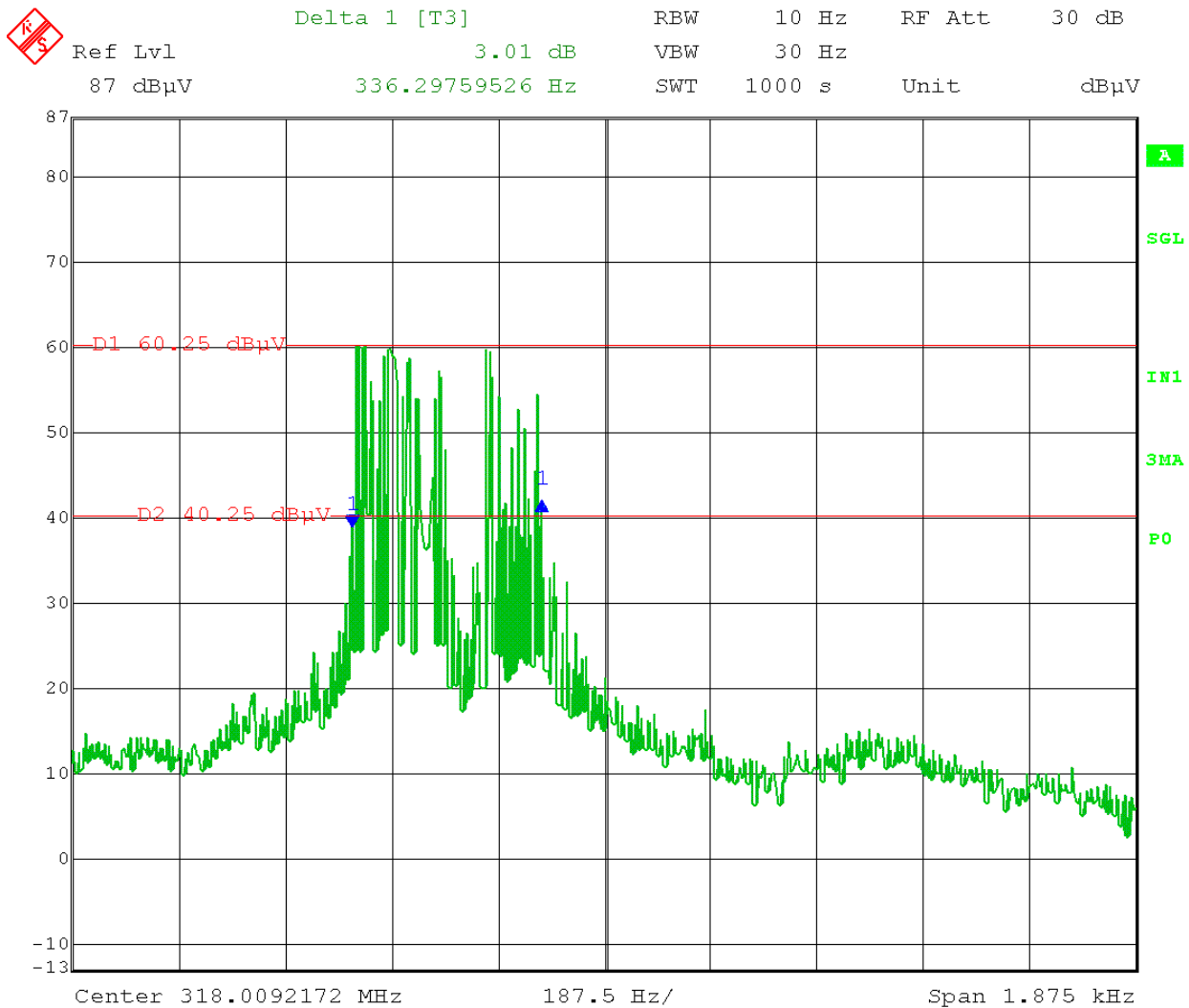
Company: RF Technologies, Inc.
Model Tested: 9450-8262
Report Number: 24382
Project Number: 10147

Section B

Test Date: 03-06-2019
Company: RF Technologies
EUT: 9450-8262 Umbilical Cord Infant Transmitter
Test: 20 dB Bandwidth
Operator: Craig B

Comment: SPAN 2 to 5 times occupied bandwidth
RBW between 1% and 5% of occupied bandwidth

20 dB Bandwidth = 336 Hz



Date: 6.MAR.2019 11:26:12



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Company:	RF Technologies, Inc.
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Section B

2.0 Automatic Deactivation

Rule Part:

15.231 (a) (2)

Test Procedure:

ANSI C63.10-2013

Limit:

A transmitter activated automatically shall cease transmission within 5 seconds after activation.

Results:

Compliant

Sample Equation(s):

None

Notes:

No transmission for five seconds after deactivation.



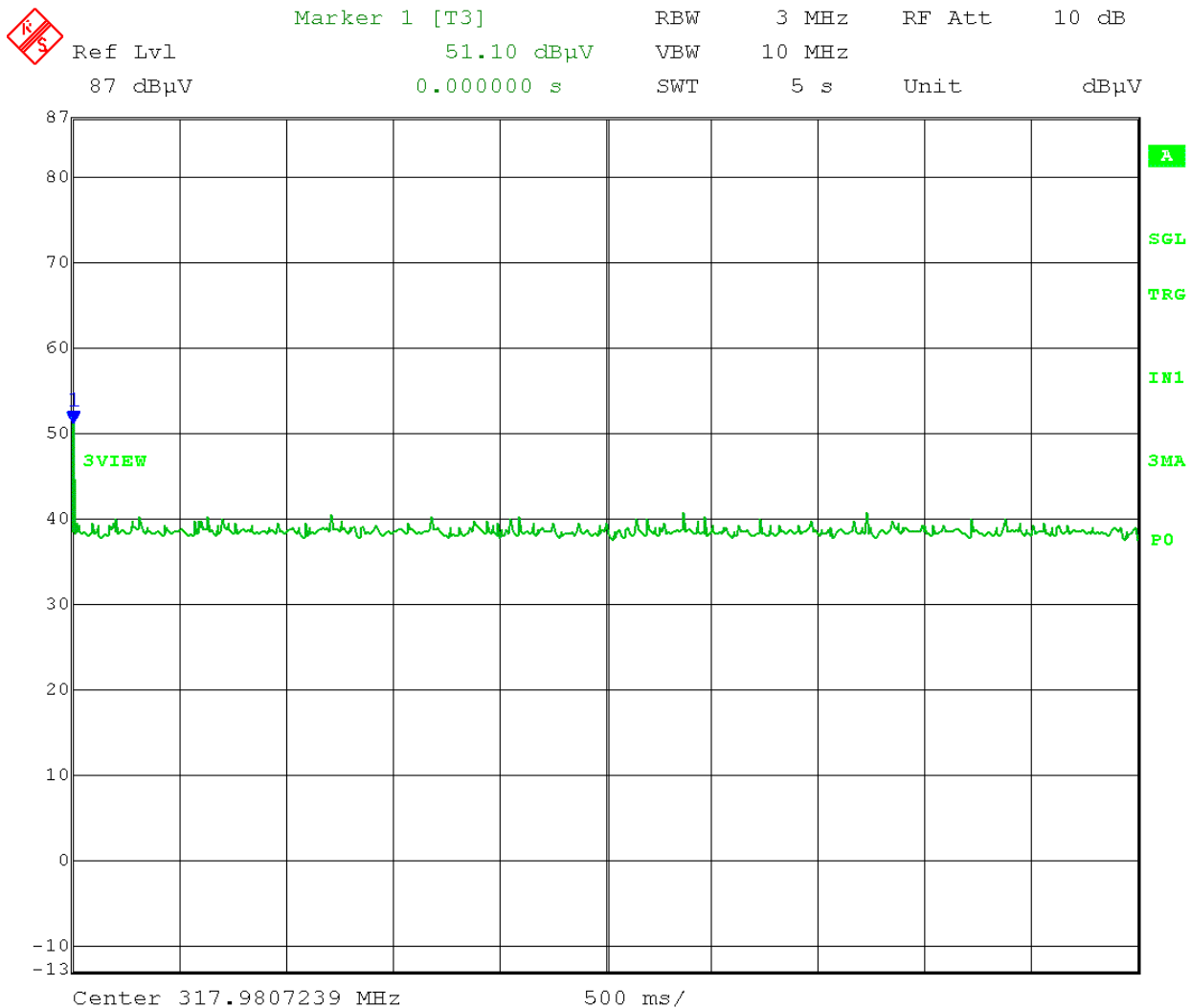
166 South Carter, Genoa City, WI 53128

Company: RF Technologies, Inc.
Model Tested: 9450-8262
Report Number: 24382
Project Number: 10147

Section B

Test Date: 03-06-2019
Company: RF Technologies
EUT: 9450-8262 Umbilical Cord Infant Transmitter
Test: Dwell Time
Operator: Craig B

Comment: A transmitter activated automatically shall cease transmission within 5 seconds after activation.



Date: 6.MAR.2019 09:54:00



166 South Carter, Genoa City, WI 53128

Company:	RF Technologies, Inc.
Model Tested:	9450-8262
Report Number:	24382
Project Number:	10147

Section B

3.0 Periodic Transmissions

Rule Part:

15.231 (a) (3)

Test Procedure:

ANSI C63.10-2013

Limit:

Total transmission time does not exceed two seconds per hour.

Results:

Compliant

Total time of transmission in an hour: 1.95 seconds

Sample Equation(s):

None

Notes:

Worst case predetermined transmissions observed.



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Company: RF Technologies, Inc.
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Section B

Test Date: 03-06-2019
Company: RF Technologies
EUT: 9450-8262 Umbilical Cord Infant Transmitter
Test: Periodic transmissions over one hour
Operator: Craig B

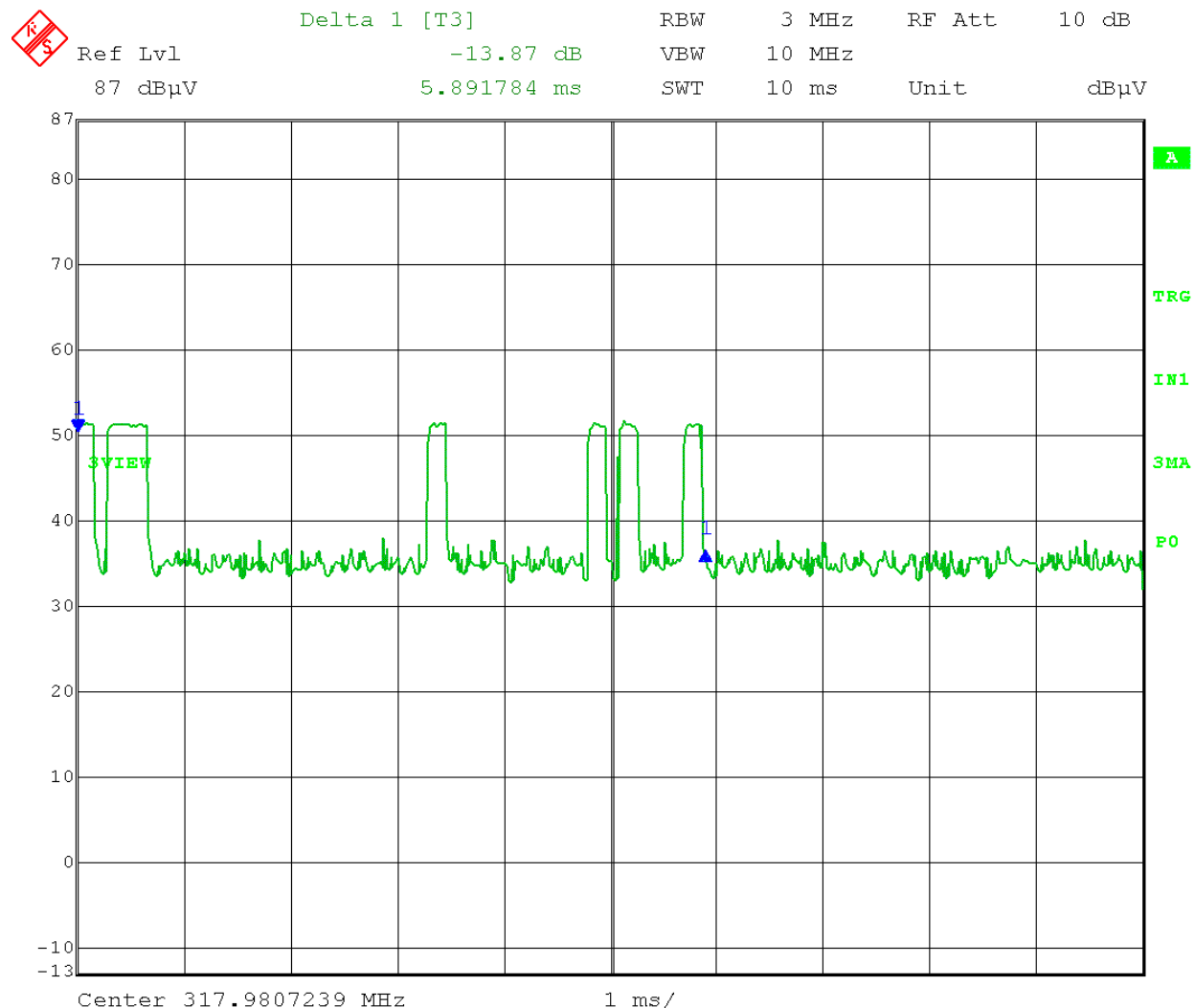
Comment: EUT transmits at regular predetermined intervals for supervision purposes used in safety application. Total transmission time must not exceed two seconds per hour.

Transmission time = 5.9 ms.

Transmission every 10.92 seconds = 330 transmissions per hour.

Total transmission time for one hour = $330 \times 5.9 \text{ ms} = 1.95 \text{ seconds}$.

Transmission Time:



Date: 6.MAR.2019 12:30:51



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Company: RF Technologies, Inc.
Model Tested: 9450-8262
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Section B

Test Date: 03-06-2019
Company: RF Technologies
EUT: 9450-8262 Umbilical Cord Infant Transmitter
Test: Periodic transmissions over one hour
Operator: Craig B

Comment: EUT transmits at regular predetermined intervals for supervision purposes used in safety application. Total transmission time must not exceed two seconds per hour.

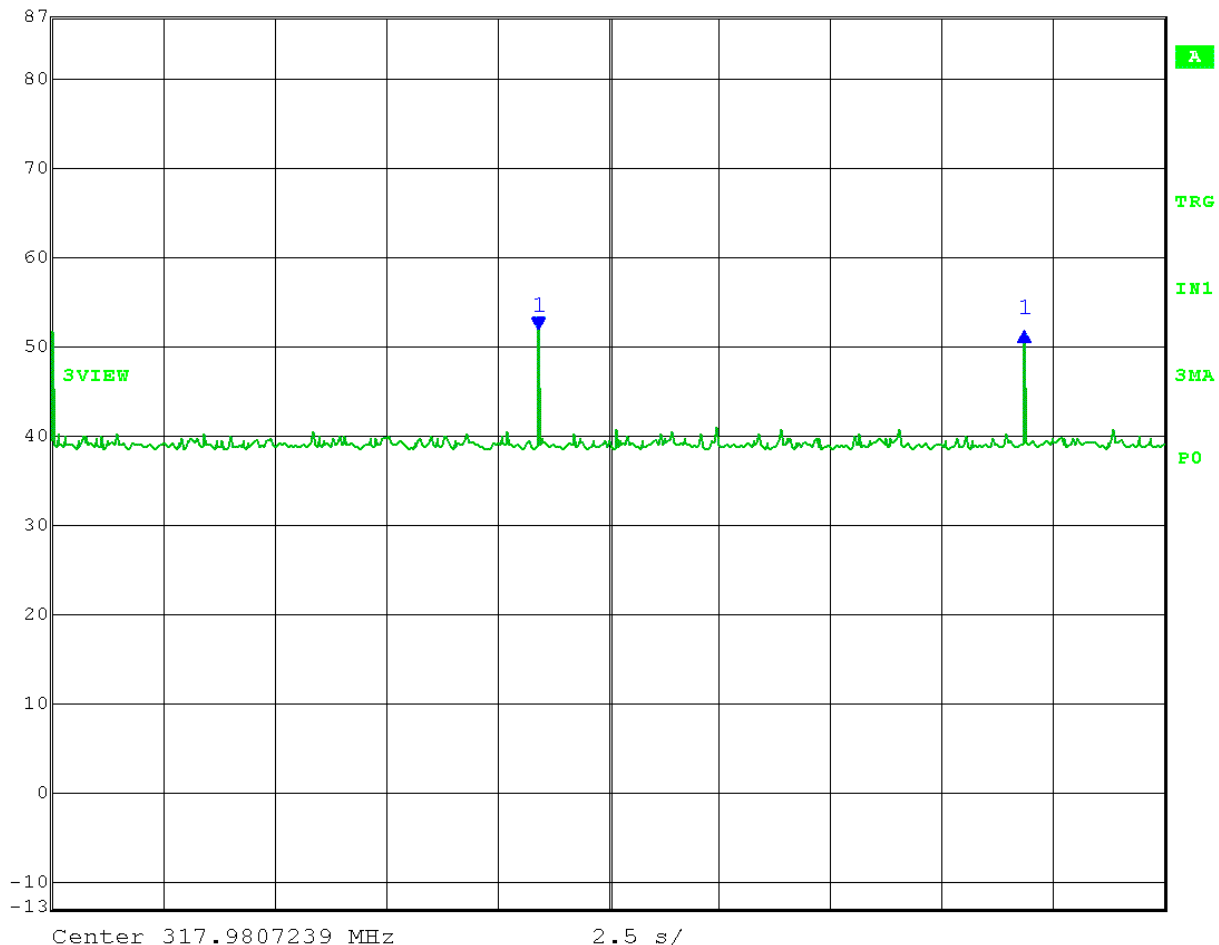
Transmission time = 5.9 ms.

Transmission every 10.92 seconds = 330 transmissions per hour.

Total transmission time for one hour = $330 \times 5.9 \text{ ms} = 1.95 \text{ seconds}$.

Time between transmissions:

	Delta 1 [T3]	RBW	3 MHz	RF Att	10 dB
Ref Lvl	-0.27 dB	VBW	10 MHz		
87 dBμV	10.927735 s	SWT	25 s	Unit	dBμV



Date: 6.MAR.2019 12:33:30



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Section B

4.0 Field Strength of Emissions – Fundamental and Spurious

Rule Part:

15.231 (b) including 15.205

Test Procedure:

ANSI C63.10-2013

Limit:

Fundamental (F) $\mu\text{V/m}$ at 3 meters: $41.6667(F) - 7083.3333$

The maximum permitted unwanted emission level is 20 dB below the maximum permitted fundamental level.

Results:

Compliant

Sample Equation(s):

$$41.6667(F) - 7083.3333 = 6166.67 \mu\text{V/m at 3 meters}$$

$$20 * \log(6166.67) = 75.80 \text{ dB } \mu\text{V/m at 3 meters}$$

$$\text{Final Corrected} = \text{Total Level} - \text{Duty Cycle Correction}$$

$$\text{Margin} = \text{Limit} - \text{Final Corrected}$$

$$\text{Total Level} = \text{Level} + \text{System Loss} + \text{Antenna Factor}$$

Notes:

The emissions were measured of the fundamental and spurious at a distance of three meters between the EUT and the measuring antenna. The EUT was rotated in 3 orthogonal planes and the highest emission was recorded. Compliance is determined by comparing peak data, minus duty cycle correction, to the average limit.



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Company: RF Technologies, Inc.
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Section B

Radiated Fundamental and Spurious Emissions – 30 MHz to 3.2 GHz

Tested at a 3 Meter Distance

EUT: 9450-8262 Umbilical Cord Infant Transmitter
 Manufacturer: RF Technologies
 Operating Condition: 70 deg F; 18% R.H.
 Test Site: Site 3
 Operator: Craig B
 Test Specification: FCC Part 15.231(b)
 Comment: Battery Operated
 Date: 03-06-2019

Notes: All other emissions at least 20 dB under the limit.
 All measurements were made with a peak detector.

Frequency (MHz)	Measurement Type	Antenna Polarization	Level (dBuV)	Antenna Factor (dB/m)	System Loss (dB)	Total Level (dBuV/m)	Duty Cycle Correction (dB)	Final Corrected (dBuV/m)	Limit (dBuV/m)	Margin (dB)	Antenna Height (m)	EUT Angle (deg)	Comment
318.000	Max Peak	Vertical	51.6	14.6	3.6	69.8	0	69.8	95.8	26.0	1.4	110	F
	Average						20	49.8	75.8				
	Max Peak	Horizontal	52.3	14.6	3.6	70.5	0	70.5	95.8	25.3	1.0	225	F
	Average						20	50.5	75.8				
636.010	Max Peak	Vertical	35.6	20.1	5.2	60.9	0	60.9	75.8	14.9	1.3	270	H
	Average						20	40.9	55.8				
	Max Peak	Horizontal	37.3	20.1	5.2	62.6	0	62.6	75.8	13.2	1.1	100	H
	Average						20	42.6	55.8				
954.010	Max Peak	Vertical	26.4	24.0	6.6	57.0	0	57.0	75.8	18.8	1.3	180	H
	Average						20	37.0	55.8				
	Max Peak	Horizontal	27.5	24.0	6.6	58.1	0	58.1	75.8	17.7	1.2	330	H
	Average						20	38.1	55.8				
1272.050	Max Peak	Vertical	68.6	25.6	-37.0	57.2	0	57.2	74.0	16.8	1.5	108	H / RB
	Average						20	37.2	54.0				
	Max Peak	Horizontal	65.8	25.6	-37.0	54.4	0	54.4	74.0	19.6	1.0	43	H / RB
	Average						20	34.4	54.0				
1590.050	Max Peak	Vertical	71.1	25.7	-38.6	58.2	0	58.2	74.0	15.8	1.5	163	H / RB
	Average						20	38.2	54.0				
	Max Peak	Horizontal	66.5	25.7	-38.6	53.6	0	53.6	74.0	20.4	1.5	149	H / RB
	Average						20	33.6	54.0				
2226.091	Max Peak	Vertical	59.9	27.5	-39.2	48.2	0	48.2	74.0	25.8	1.9	18	H / RB
	Average						20	28.2	54.0				
	Max Peak	Horizontal	56.1	27.5	-39.2	44.4	0	44.4	74.0	29.6	1.8	180	H / RB
	Average						20	24.4	54.0				
3180.094	Max Peak	Vertical	54.7	31.0	-38.7	47.0	0	47.0	75.8	28.8	1.4	200	H
	Average						20	27.0	55.8				
	Max Peak	Horizontal	55.3	31.0	-38.7	47.6	0	47.6	75.8	28.2	2.1	195	H
	Average						20	27.6	55.8				

Legend: H=Harmonic ; RB=Restricted Band ; F=Fundamental

Level = Total Level - System Loss - Antenna Factor

Final Corrected = Total Level - Duty Cycle Correction

Margin = Limit - Final Corrected



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Section B

Company:	RF Technologies, Inc.
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5.0 Duty Cycle Correction (318 MHz)

Rule Part:

15.35 (c)

Test Procedure:

ANSI C63.10-2013

Limit:

Informative

Results:

Duty Cycle Correction Factor = -24.4 dB

Sample Equation(s):

Duration of one transmit time: 6.012024 ms

Number of transmit times during 100 ms period: 1

Total ON time in 100 ms = 6.012024 ms

Duty Cycle correction = $20 \log(6.012024/100) = -24.4 \text{ dB}$

Notes:

Compliance is determined by comparing peak detector data, minus duty cycle correction, to the average limit.

Since there is a limit of Peak emission that is only 20 dB above the limit of Average emission, a duty cycle correction factor greater than 20 dB would not be beneficial. Therefore, a duty cycle correction of 20 dB was applied to the Peak detector measurement level to show compliance to the average limits.



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Section B

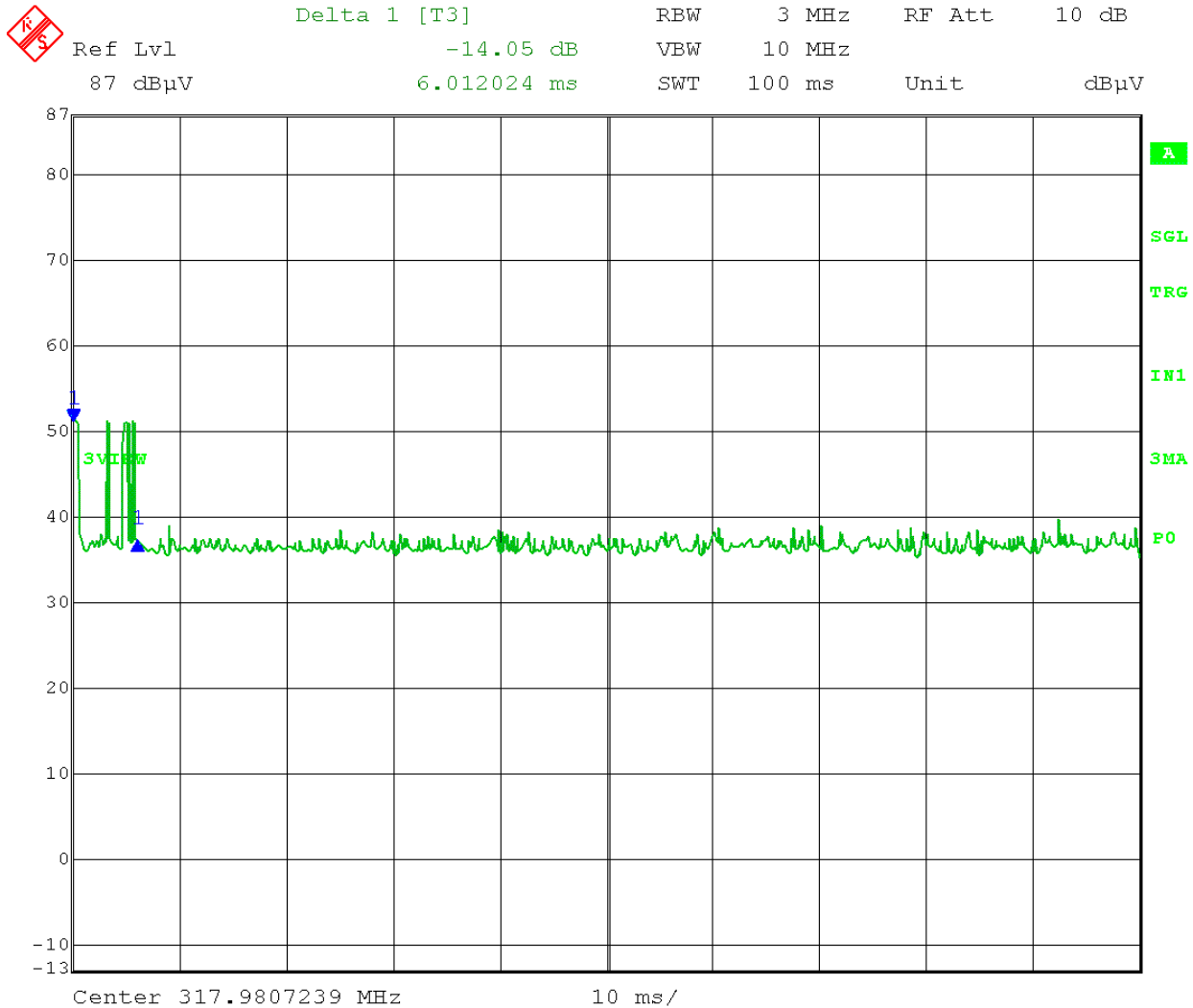
Company: RF Technologies, Inc.
Model Tested: 9450-8262
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Normal Operation

Test Date: 03-06-2019
Company: RF Technologies
EUT: 9450-8262 Umbilical Cord Infant Transmitter
Test: Duty Cycle – worst case for normal operation
Operator: Craig B

Comment: Duration of one transmit time: 6.012024 ms
Number of transmit times during 100 ms period: 1
Total ON time in 100 ms = 6.012024 ms
Duty Cycle correction = $20 \log(6.012024/100) = -24.4 \text{ dB}$

100 ms sweep:



Date: 6.MAR.2019 09:48:53



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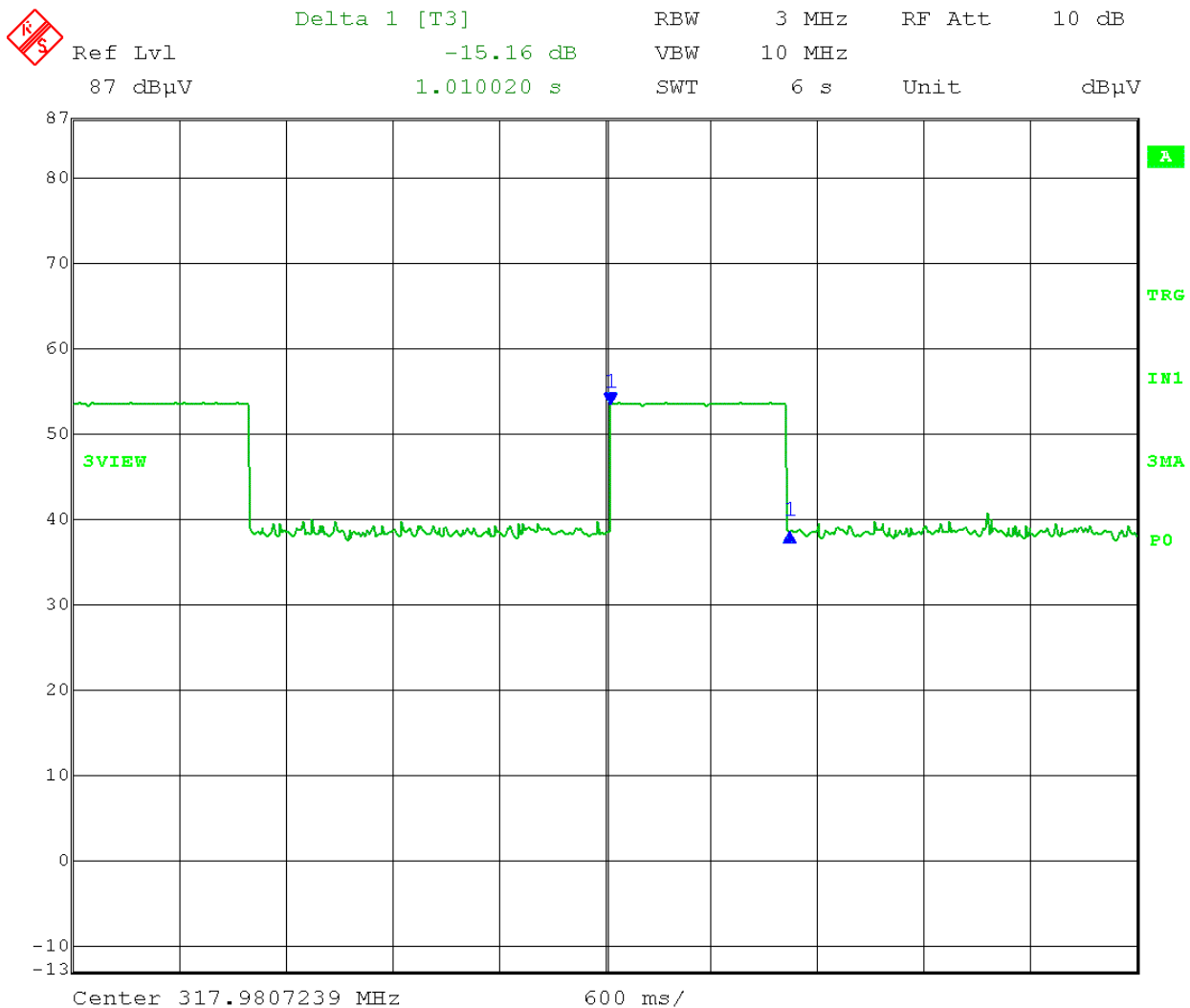
Section B

Company: RF Technologies, Inc.
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Project Number: 10147

Test Mode

Test Date: 03-06-2019
Company: RF Technologies
EUT: 9450-8262 Umbilical Cord Infant Transmitter
Test: Duty Cycle – special mode for testing purposes
Operator: Craig B

Comment: One wide pulse: 1 second
Total ON time in 100 ms = 100 ms



Date: 6.MAR.2019 12:41:25

Section C – Measurement Uncertainty

Compliance with the limits in this standard are based on the results of the compliance measurement. Our calculated measurement uncertainty including the measurement instrumentation, associated connections between the various instruments in the measurement chain, and other contributions, are provided in this section of the test report.

Radiated Emission 30 MHz to 18 GHz Uncertainty

		Uncertainty (+/- dB)	Uncertainty (+/- dB)	Uncertainty (+/- dB)	Uncertainty (+/- dB)	Uncertainty (+/- dB)	Uncertainty (+/- dB)	Uncertainty (+/- dB)	Uncertainty (+/- dB)	Uncertainty (+/- dB)
Contribution	Probability Distribution	3M	3M	3M	3M	3M	3M	10M	10M	10M
		30- 100MHz.	100- 700MHz	700- 1000MHz.	1- 4.5Ghz	4.5 - 7Ghz	7 - 18Ghz	30- 100MHz.	100- 700MHz.	700- 1000MHz.
Combined Standard Un- certainty	Normal	1.70	1.62	1.66	2.13	2.48	2.85	1.64	1.58	1.66
Expanded Uncertainty	Normal (k=2)	3.40	3.23	3.33	4.26	4.95	5.69	3.29	3.16	3.31

END OF REPORT

Revision #	Date	Comments	By
1.0	03-14-2019	Initial Release	CB