

Amber Helm Development L.C.

92723 Michigan Hwy-152

Sister Lakes, Michigan 49047 USA

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EMC Test Report

GAIX-1802219TX

Issued: February 22, 2018

regarding

USA: CFR Title 47, Part 15.209 (Emissions)
Canada: ISSED RSS-GENv4 (Emissions)

for



M3N284074

Category: Transmitter

Judgements:

15.209/RSS-GENv4 Transmitter

Tested: January 25, 2018



NVLAP LAB CODE 200129-0

Prepared for:

Continental Automotive

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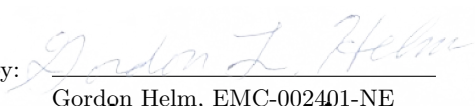
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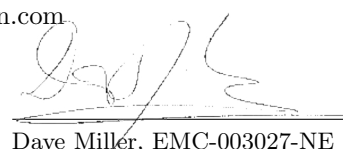
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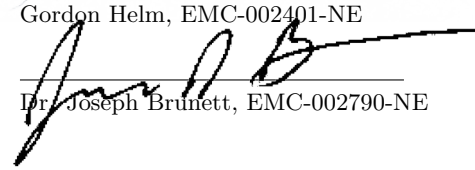
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Revision History

Rev. No.	Date	Details	Revised By
r0	February 22, 2018	Initial Release.	J. Brunett
r1	March 8, 2018	Include fundamental image.	J. Brunett

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1 Test Report Scope and Limitations

1.1 Laboratory Authorization

Test Facility description and attenuation characteristics are on file with the FCC Laboratory, Columbia, Maryland (FCC Reg. No: 90413) and with ISED Canada, Ottawa, ON (File Ref. No: IC3161). Amber Helm Development L.C. holds accreditation under NVLAP Lab Code 200129-0 and includes within its scope CFR Title 47 Part 15 Subparts B and C.

1.2 Report Retention

For equipment verified to comply with the regulations herein, the manufacturer is obliged to retain this report with the product records for the life of the product, and no less than ten years. A copy of this Report will remain on file with this laboratory until February 2028.

1.3 Subcontracted Testing

This report does not contain data produced under subcontract.

1.4 Test Data

This test report contains data included within the laboratories scope of accreditation.

1.5 Limitation of Results

The test results contained in this report relate only to the item(s) tested. Any electrical or mechanical modification made to the test item subsequent to the test date shall invalidate the data presented in this report. Any electrical or mechanical modification made to the test item subsequent to this test date shall require reevaluation.

1.6 Copyright

This report shall not be reproduced, except in full, without the written approval of Amber Helm Development L.C..

1.7 Endorsements

This report shall not be used to claim product endorsement by any accrediting, regulatory, or governmental agency.

1.8 Test Location

The EUT was fully tested by **Amber Helm Development L.C.**, 92723 Michigan Hwy-152, Sister Lakes, Michigan 49047 USA. Table 1 lists all sites employed herein. Specific test sites utilized are also listed in the test results sections of this report.

Table 1: Test Site List.

Description	Location	Quality Num.
OATS (3m & 10m)	92723 Michigan Hwy-152, Sister Lakes, Michigan 49047 USA	OATSA

1.9 Traceability and Equipment Used

Pertinent test equipment used for measurements at this facility is listed in Table 2. The quality system employed at Amber Helm Development L.C. has been established to ensure all equipment has a clearly identifiable classification, calibration expiry date, and that all calibrations are traceable to the SI through NIST, other recognized national laboratories, accepted fundamental or natural physical constants, ratio type of calibration, or by comparison to consensus standards.

Table 2: Equipment List.

Description	Manufacturer/Model	SN	Quality Num.	Last Cal By / Date Due
Spectrum Analyzer	Rohde & Schwarz / FSV30	101660	RSFSV30001	RS / Apr-2019
Shielded Loop Antenna	EMCO / 6502	9502-2926	EMCOLOOP1	Lib. Labs. / Aug-2018
BiconiLog Antenna	EMCO / 3142	1169	BILO3142	Lib.Labs / May-2018
(3m) RG8 Coax	CS-3227 / CS-3227	C060914	CS3227	AHD / Mar-2018
EMI Receiver	HP / 85460A/85462A	3704A00422, 3807A00465	HP8546A	Techmaster / Apr-2018
(3m) LMR-400 Coax	AHD / LMR400	C090804	LMR400	AHD / Mar-2018
(LCI) DS Coax	AHD / RG58/U	920809	RG58U	AHD / Jul-2018
(10-m) Amelco Coax	AHD / RG213U	9903-10ab	RG213U	AHD / Mar-2018
Double Ridged Horn	EMCO / 3115	2788	RH3115	Lib.Labs. / July-2018

2 Test Specifications and Procedures

2.1 Test Specification and General Procedures

The ultimate goal of Continental Automotive is to demonstrate that the Equipment Under Test (EUT) complies with the Rules and/or Directives below. Detailed in this report are the results of testing the Continental Automotive M3N284074 for compliance to:

Country/Region	Rules or Directive	Referenced Section(s)
United States	Code of Federal Regulations	CFR Title 47, Part 15.209
Canada	ISED Canada	ISED RSS-GENv4

It has been determined that the equipment under test is subject to the rules and directives above at the date of this testing. In conjunction with these rules and directives, the following specifications and procedures are followed herein to demonstrate compliance (in whole or in part) with these regulations.

ANSI C63.4:2014	"Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz"
ANSI C63.10:2013 (USA)	"American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices"
IEEE Trans. EMC, Vol. 47, No. 3 August 2005	"Extrapolating Near-Field Emissions of Low-Frequency Loop Transmitters," J.D.Brunett, V.V.Liepa, D.L.Sengupta
TP0102RA	"AHD Internal Document TP0102 - Radiated Emissions Test Procedure"
ISED Canada	"The Measurement of Occupied Bandwidth"

3 Configuration and Identification of the Equipment Under Test

3.1 Description and Declarations

The equipment under test is an automotive passive entry transceiver. The EUT is approximately 4 x 3 x 1 cm (main) in dimension, and is depicted in Figure 1. It is powered by 13.4 VDC vehicular power system. In use, this device is installed into a motor vehicle. Table 3 outlines provider declared EUT specifications.



Figure 1: Photos of EUT.

Table 3: EUT Declarations.

General Declarations			
Equipment Type:	Transmitter	Country of Origin:	Not Declared
Nominal Supply:	13.4 VDC	Oper. Temp Range:	Not Declared
Frequency Range:	0.125 MHz	Antenna Dimension:	Not Declared
Antenna Type:	LF Coil	Antenna Gain:	LF Coil
Number of Channels:	1	Channel Spacing:	Not Applicable
Alignment Range:	Not Declared	Type of Modulation:	ASK
United States			
FCC ID Number:	M3N284074	Classification:	DCD
Canada			
IC Number:	7812A-284074	Classification:	Remote Control Device, Vehicular Device

3.1.1 EUT Configuration

The EUT is configured for testing as depicted in Figure 2.

3.1.2 Modes of Operation

This device is capable of only a single mode of operation, as a 125 kHz LF immobilizer transmitter

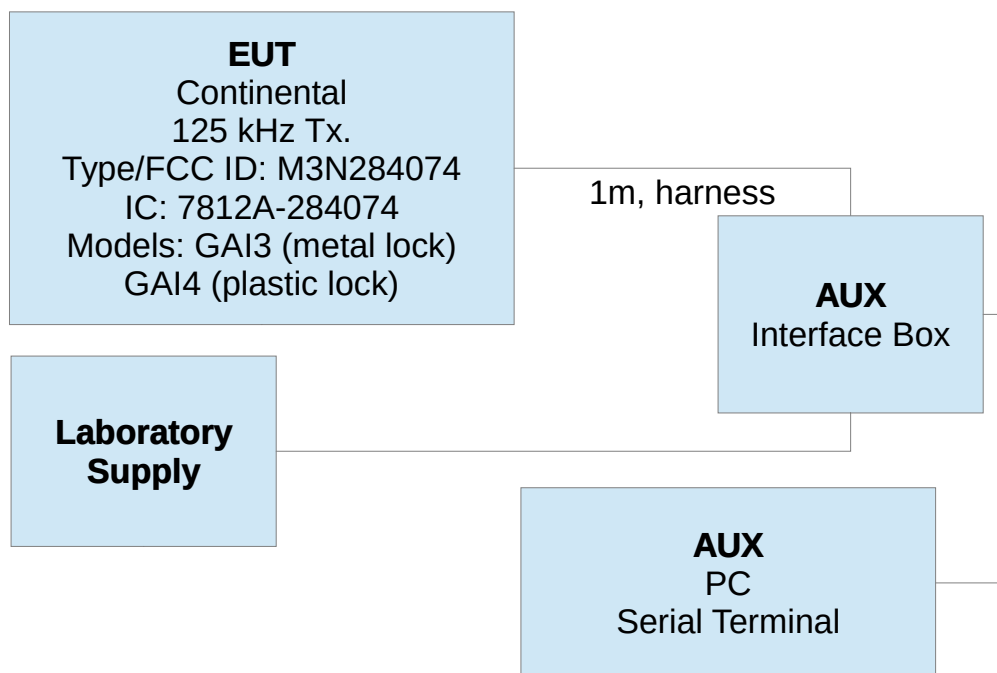


Figure 2: EUT Test Configuration Diagram.

3.1.3 Variants

There are a total of four new variants of the EUT, (models: GAI1, GAI2, GAI3, and GAI4) two of which (GAI3 and GAI4) are modified from the originally certified device and are fully measured herein. Model GAI3 is updated to work on a non-metallic lock housing. Model GAI4 is updated with a new connector shape.

3.1.4 Test Samples

Two normal operating samples capable of pulsed transmissions were provided interfaced to a vehicle bus simulator.

3.1.5 Functional Exerciser

Normal operating EUT functionality was verified by observation of transmitted signal.

3.1.6 Modifications Made

There were no modifications made to the EUT by this laboratory.

3.1.7 Production Intent

The EUT appears to be a production ready sample.

3.1.8 Declared Exemptions and Additional Product Notes

The EUT is permanently installed in a transportation vehicle. As such, digital emissions are exempt from US and Canadian digital emissions regulations (per FCC 15.103(a) and IC correspondence on ICES-003).

4 Emissions

4.1 General Test Procedures

4.1.1 Radiated Test Setup and Procedures

Radiated electromagnetic emissions from the EUT are first pre-scanned in our screen room. Spectrum and modulation characteristics of all emissions are recorded. Instrumentation, including spectrum analyzers and other test equipment as detailed in Section 1.8 are employed. After pre-scan, emission measurements are made on the test site of record. If the EUT connects to auxiliary equipment and is table or floor standing, the configurations prescribed in relevant test standards are followed. Alternatively, a layout closest to normal use (as declared by the provider) is employed if the resulting emissions appear to be worst-case in such a configuration. See Figure 3. All intentionally radiating elements that are not fixed-mounted in use are placed on the test table lying flat, on their side, and on their end (3-axes) and the resulting worst case emissions are recorded. If the EUT is fixed-mounted in use, measurements are made with the device oriented in the manner consistent with installation and then emissions are recorded. If the EUT exhibits spurious emissions due to internal receiver circuitry, such emissions are measured with an appropriate carrier signal applied.

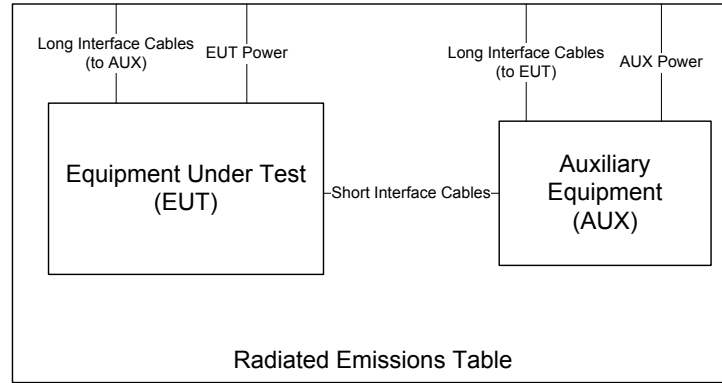


Figure 3: Radiated Emissions Diagram of the EUT.

For devices with intentional emissions below 30 MHz, a shielded loop antenna and/or E-field and H-Field broadband probes are used depending on the regulations. Shielded loops are placed at a 1 meter receive height at the desired measurement distance. For exposure in this band, the broadband probes employed are 10cm diameter single-axis shielded transducers and measurements are repeated and summed over three axes.

Emissions between 30 MHz and 1 GHz are measured using calibrated broadband antennas. For both horizontal and vertical polarizations, the test antenna is raised and lowered from 1 to 4 m in height until a maximum emission level is detected. The EUT is then rotated through 360° in azimuth until the highest emission is detected. The test antenna is then raised and lowered one last time from 1 to 4 m and the worst case value is recorded. Emissions above 1 GHz are characterized using standard gain or broadband ridge-horn antennas on our OATS with a 4×5 m rectangle of ECCOSORB absorber covering the OATS ground screen and a 1.5m table height. Care is taken to ensure that test receiver resolution and video bandwidths meet the regulatory requirements, and that the emission bandwidth of the EUT is not reduced. Photographs of the test setup employed are depicted in Figure 4.

Where regulations allow for direct measurement of field strength, power values (dBm) measured on the test receiver / analyzer are converted to $\text{dB}\mu\text{V}/\text{m}$ at the regulatory distance, using

$$E_{dist} = 107 + P_R + K_A - K_G + K_E - C_F$$

where P_R is the power recorded on spectrum analyzer, in dBm, K_A is the test antenna factor in dB/m, K_G is the combined pre-amplifier gain and cable loss in dB, K_E is duty correction factor (when applicable) in dB, and C_F is a distance conversion (employed only if limits are specified at alternate distance) in dB. This field strength value is then compared with the regulatory limit. If effective isotropic radiated power (EIRP) is computed, it is computed as

$$\text{EIRP}(\text{dBm}) = E_{3m}(\text{dB}\mu\text{V}/\text{m}) - 95.2.$$

When presenting data at each frequency, the highest measured emission under all possible EUT orientations (3-axes) is reported.

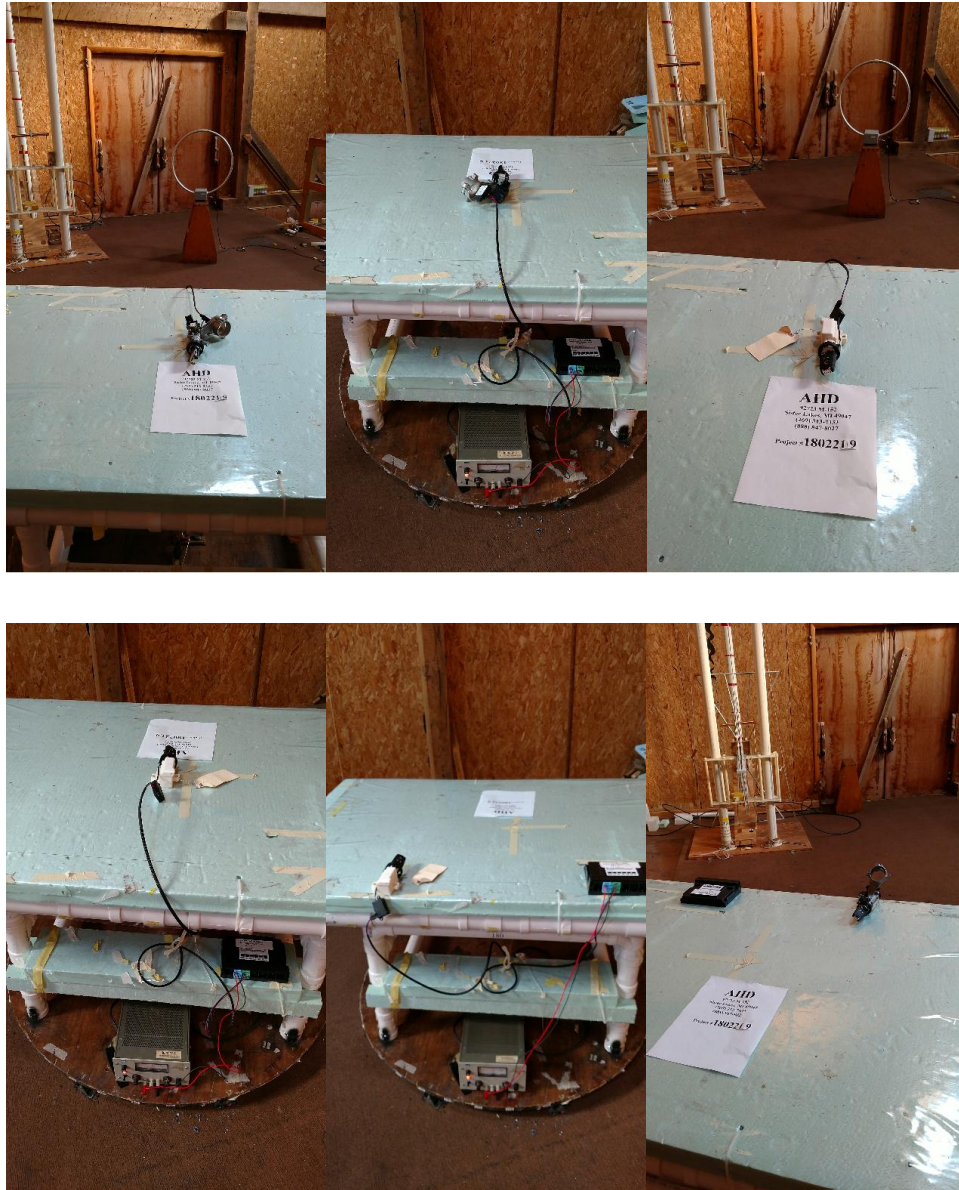


Figure 4: Radiated Emissions Test Setup Photograph(s).

4.1.2 Conducted Emissions Test Setup and Procedures

4.1.3 Power Supply Variation

Tests at extreme supply voltages are made if required by the the procedures specified in the test standard, and results of this testing are detailed in this report.

4.2 Intentional Emissions

4.2.1 Fundamental Emission Pulsed Operation

The details and results of testing the EUT for pulsed operation are summarized in Table 4.

Table 4: Pulsed Emission Characteristics (Duty Cycle).

Frequency Range
9 kHz ≤ f ≤ 150 kHz

Det
Pk/QPk

IF Bandwidth
10 kHz

Video Bandwidth
30 kHz

Test Date: 8-Feb-18
Test Engineer: Joseph Brunett
EUT Mode: Periodic Operating
Meas. Distance: 60 cm
EUT Tested: Conti GAIX

#	EUT Mode	Overall Transmission			Max. Frame Length (ms)	Min. Frame Period (s)	Frame Encoding	Computed Duty Cycle*	
		Min. Repetition Rate (sec)	Max. No. of Frames	Total Transmission Length (sec)				(%)	Duty (dB)
1	Key In	0.1573	2	0.1573	59.5	N/A	When a key is inserted into the lock housing with the EUT attached, the EUT transmits one 10.8 ms CW frame followed by one 59.5 ms CW frame every 157.3 ms. Both frames occur within a 100 ms window.	70.3	0.0
2	Key Out	0.2340	3	0.234	38.0	N/A	When no key is present, the EUT transmits one 35.8 ms frame, one 38 ms frame, and one 11.3 ms frame every 234 ms. Only the first two frames occur within a 100 ms window.	73.8	0.0

* No Duty Cycle is employed when demonstrating compliance.

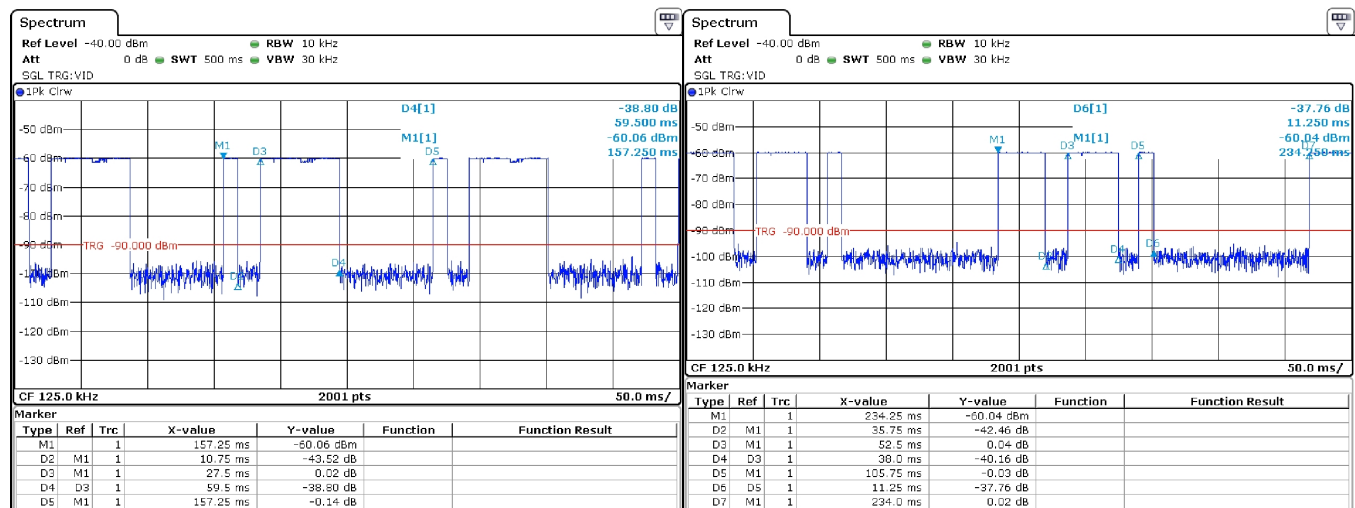


Figure 5: Pulsed Emission Characteristics (Duty Cycle).

4.2.2 Fundamental Emission Bandwidth

Emission bandwidth (EBW) of the EUT is measured with the device placed in the test mode(s) with the shortest available frame length and minimum frame spacing. Radiated emissions are recorded following the test procedures listed in Section 2.1. The 20 dB EBW is measured as the max-held peak-detected signal when the IF bandwidth is greater than or equal to 1% of the receiver span. For complex modulations other than ASK and FSK, the 99% emission bandwidth per IC test procedures has a different result, and is also separately reported. The results of EBW testing are summarized in Table 5. Plots showing measurements employed to obtain the emission bandwidth reported are provided in Figure 6.

Table 5: Intentional Emission Bandwidth.

Frequency Range	Det	IF Bandwidth	Video Bandwidth	Test Date:	8-Feb-18
9 kHz ≤ f ≤ 150 kHz	Pk	> 1% Span	≥ 3 * IFBW	Test Engineer:	Joseph Brunett
150 kHz ≤ f ≤ 30 MHz	Pk	> 1% Span	≥ 3 * IFBW	EUT Mode:	Periodic Operating
				Meas. Distance:	0.6 m
				EUT Tested:	Conti GAIX

#	Frequency (MHz)	Temp (C)	Supply (VDC)	20 dB EBW (kHz)	99% EBW (kHz)	110 kHz Restricted Band* (dBc)		
1	0.125	21	13.4	25.1	34.7	26.4		

* Note: The EUT emissions in the 90-110 kHz restricted band is down 26.4 dB from the fundamental.

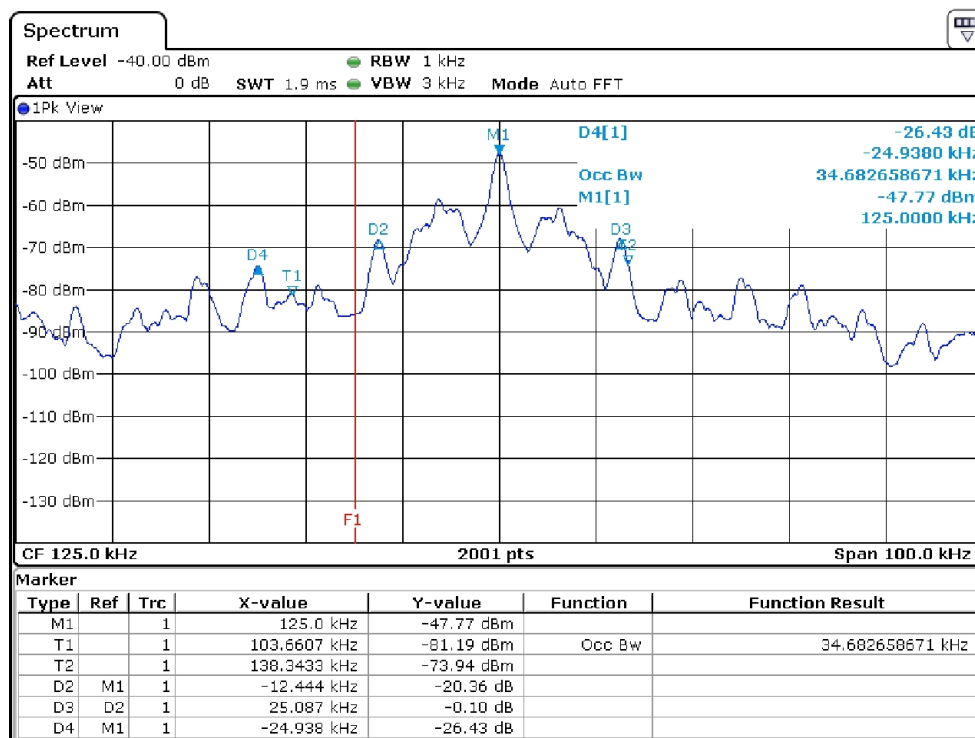


Figure 6: Intentional Emission Bandwidth.

4.2.3 Fundamental Emission

Following the test procedures listed in Section 2.1, field emissions measurements are made on the EUT for both Horizontal and Vertically polarized coupling fields. The EUT's loop antenna(s) are measured along all three axes, including when the EUT loop axes are aligned in the same axis as the test loop and aligned coplanar (in the same plane) with the test loop antenna. Table 6 details the results of these measurements.

Table 6(a): Fundamental Radiated Emissions.

Frequency Range			Det		IF Bandwidth		Video Bandwidth			Test Date:		5-Feb-18	
9 kHz ≤ f ≤ 150 kHz			Pk/QPk		200 Hz		300 Hz			Test Engineer:		Gordon Helm	
150 kHz ≤ f ≤ 30 MHz			Pk/QPk		9 kHz		30 kHz			EUT Mode:		CW	
25 MHz ≤ f ≤ 1 000 MHz			Pk/QPk		120 kHz		300 kHz			Meas. Distance:		3 meters	
f > 1 000 MHz			Pk		1 MHz		3MHz			EUT Tested:		Conti GAIX	
f > 1 000 MHz			Avg		1 MHz		3MHz						

Fundamental Emissions Measurements															
#	Mode	EUT Orientation	Freq. kHz	Ant. Used QN	Ant.** Height m	Table Azim deg	Ka dB/m	Kg dB	Cf*** 3m / 300m dB	E-field @ 3m Pk dBuV/m	Qpk dBuV/m	Pk dBuV/m	Qpk dBuV/m	Limit Qpk dBuV/m	Pass By****
1	GAI3 CW	Flat	125.0	EMCOLOOP1	1.0	180	10.1	0.0	80.0	52.2		-27.8		25.7	53.5
2		Side	125.0	EMCOLOOP1	1.0	90	10.1	0.0	80.0	48.7		-31.3		25.7	57.0
3		End	125.0	EMCOLOOP1	1.0	180	10.1	0.0	80.0	40.1		-39.9		25.7	65.6
4	GAI4 CW	Flat	125.0	EMCOLOOP1	1.0	180	10.1	0.0	80.0	58.0		-22.0		25.7	47.7
5		Side	125.0	EMCOLOOP1	1.0	90	10.1	0.0	80.0	50.2		-29.8		25.7	55.5
6		End	125.0	EMCOLOOP1	1.0	180	10.1	0.0	80.0	44.3		-35.7		25.7	61.4

#	Mode	Test Antenna Polarization	Freq. kHz	DC Supply Voltage	E-field dBuV/m
7	GAI4 CW	Flat	125.0	15.2	58.0
8			125.0	13.4	58.0
9			125.0	11.5	58.0

Measured OATS Field Decay Rate to Confirm Field Conversion			
Freq. MHz	Dist from EUT m	Pr (Pk) dBm	Formula Fit Pr (Pk) vs Distance
125.000	.5	-16.3	-22.073 ln(x) - 30.6
125.000	1.0	-29.1	Base 10 Rate of Decay***
125.000	2.0	-45.9	(dB/dec)
125.000	4.0	-61.7	-50.8

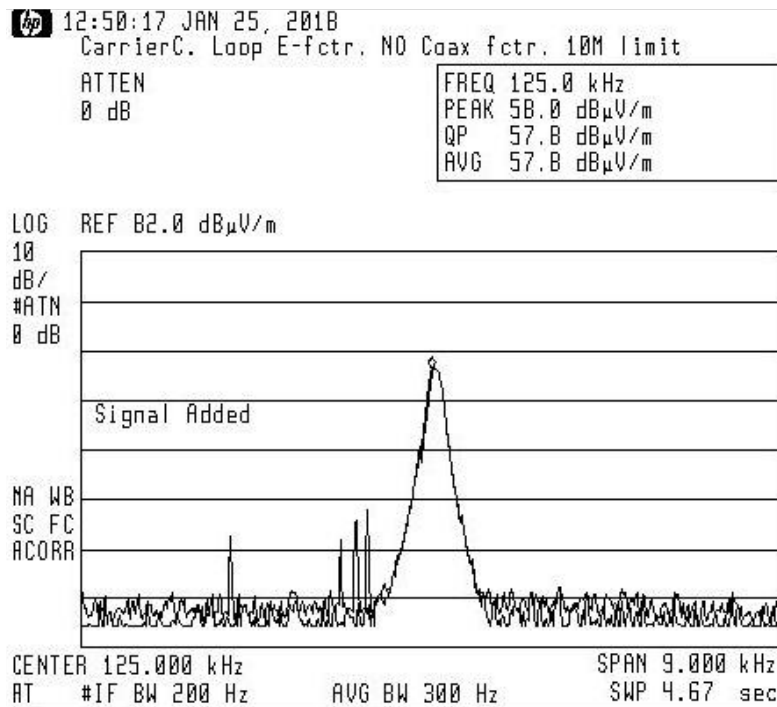
* EUT was tested in CW mode. No averaging or Quasi-Peak data was needed to demonstrate compliance.

** Emissions were evaluated at 1m test antenna height.

*** FCC E-field 40 dB/dec decay assumed. EUT field decay rate was not measured over a range of distances to determine CF between measurement and limit distance.

**** Peak emission reported in original test report is consistent with measurements made at 3 meter distance (not 10m as reported). Change in measured level at 3 m is less than 3 dB. This has been confirmed by manufacturer to be a clerical error on behalf of the original test laboratory.

Table 6(b): Fundamental Radiated Emissions.



4.3 Unintentional Emissions

4.3.1 Transmit Chain Spurious Emissions

The results for the measurement of transmit chain spurious emissions at the nominal voltage and temperature are provided in Table 7. Following the test procedures listed in Section 2.1, field emissions measurements are made on the EUT for both Horizontal and Vertically polarized coupling fields. The EUT's loop antenna(s) are measured when the EUT loop axes placed in all three axes, including when they are aligned along the same axis as the test loop antenna and are aligned coplanar with the test loop antenna. For all arrangements, test loop is rotated for maximum field. The results for the measurement of transmit chain spurious emissions at the nominal voltage and temperature are provided in Table 7. Measurements are performed to 10 times the highest fundamental operating frequency.

Table 7: Transmit Chain Spurious Emissions.

Frequency Range	Det	IF Bandwidth	Video Bandwidth	Test Date:	5-Feb-18
9 kHz ≤ f ≤ 150 kHz	Pk/QPk	200 Hz	300 Hz	Test Engineer:	Gordon Helm
150 kHz ≤ f ≤ 30 MHz	Pk/QPk	9 kHz	30 kHz	EUT Mode:	CW
25 MHz ≤ f ≤ 1 000 MHz	Pk/QPk	120 kHz	300 kHz	Meas. Distance:	3 meters
f > 1 000 MHz	Pk	3 MHz	3MHz	EUT Tested:	Conti GAIX
f > 1 000 MHz	Avg	3 MHz	10kHz		

Transmit Chain Spurious Emissions																
#	Mode	EUT	Freq.	Ant.	Ant.**	Table	Ka	Kg	Cf***	E-field @ 3m		E-field @ 30/300m			Pass By	Comments
		Orientation	kHz	Used	Height m	Azim deg	dB/m	dB	(3 to 30/300m) dB	Pk dBuV/m	Qpk dBuV/m	Pk dBuV/m	Qpk dBuV/m	Limit (Qpk) dBuV/m		
1	GA13 CW	Max All, Worst	250.0	EMCOLOOP1	1.0	180	10.0	0.0	80.0	19.2		-60.8		19.6	80.4	noise floor
2		Max All, Worst	375.0	EMCOLOOP1	1.0	180	10.0	0.0	80.0	23.9		-56.1		16.1	72.2	
3		Max All, Worst	500.0	EMCOLOOP1	1.0	180	10.2	0.0	40.0	31.2		-8.8		33.6	42.4	background
4		Max All, Worst	625.0	EMCOLOOP1	1.0	180	10.2	0.0	40.0	23.4		-16.6		31.7	48.3	
5		Max All, Worst	750.0	EMCOLOOP1	1.0	180	10.1	0.0	40.0	39.6		-0.4		30.1	30.5	background
6		Max All, Worst	875.0	EMCOLOOP1	1.0	180	10.3	0.0	40.0	16.1		-23.9		28.8	52.7	
7		Max All, Worst	1000.0	EMCOLOOP1	1.0	180	11.5	0.0	40.0	36.6		-3.4		27.6	31.0	background
8		Max All, Worst	1125.0	EMCOLOOP1	1.0	180	11.3	0.0	40.0	9.6		-30.4		26.6	57.0	noise floor
9		Max All, Worst	1250.0	EMCOLOOP1	1.0	180	12.3	0.0	40.0	7.8		-32.2		25.7	57.9	noise floor
10	GA14 CW	Max All, Worst	250.0	EMCOLOOP1	1.0	180	10.0	0.0	80.0	19.2		-60.8		19.6	80.4	noise floor
11		Max All, Worst	375.0	EMCOLOOP1	1.0	180	10.0	0.0	80.0	50.2		-29.8		16.1	45.9	
12		Max All, Worst	500.0	EMCOLOOP1	1.0	180	10.2	0.0	40.0	31.2		-8.8		33.6	42.4	background
13		Max All, Worst	625.0	EMCOLOOP1	1.0	180	10.2	0.0	40.0	33.8		-6.2		31.7	37.9	
14		Max All, Worst	750.0	EMCOLOOP1	1.0	180	10.1	0.0	40.0	39.6		-0.4		30.1	30.5	background
15		Max All, Worst	875.0	EMCOLOOP1	1.0	180	10.3	0.0	40.0	25.0		-15.0		28.8	43.8	
16		Max All, Worst	1000.0	EMCOLOOP1	1.0	180	11.5	0.0	40.0	36.3		-3.7		27.6	31.3	background
17		Max All, Worst	1125.0	EMCOLOOP1	1.0	180	11.3	0.0	40.0	22.2		-17.8		26.6	44.4	noise floor
18		Max All, Worst	1250.0	EMCOLOOP1	1.0	180	12.3	0.0	40.0	17.3		-22.7		25.7	48.4	noise floor

* EUT was tested in CW mode. No averaging applies and Quasi-Peak data was not needed to demonstrate compliance.

** Emissions were evaluated at 1m test antenna height, measured up to 30 MHz. No other emissions beyond harmonics observed.

*** FCC E-field 40 dB/dec decay assumed. EUT field decay rate was not measured over a range of distances to determine CF between measurement and limit distance.

Measured OATS Field Decay Rate to Confirm Field Conversion below 490 KHz											
Freq. kHz	Dist. m	Pr (Pk) dBm	Formula Fit Pr (Pk) vs Distance	Freq. kHz	Dist. m	Pr (Pk) dBm	Formula Fit Pr (Pk) vs Distance	Freq. kHz	Dist. m	Pr (Pk) dBm	Formula Fit Pr (Pk) vs Distance
250.0	.5	-54	-20.198 ln(x) - 67.7	375.0	.5	-58.1	-22.766 ln(x) - 52.96	625.0	.5	-58.1	-23.011 ln(x) - 67.37
250.0	1.0	-67	Base 10 Rate of Decay***	375.0	1.0	-61.0	Base 10 Rate of Decay***	625.0	1.0	-66.0	Base 10 Rate of Decay***
250.0	2.0	-82	(dB/dec)	375.0	2.0	-69.0	(dB/dec)	625.0	2.0	-84.0	(dB/dec)
250.0	4.0	noise	-46.5	375.0	4.0	-85.0	-52.4	625.0	4.0	noise	-53.0

*** A Ln (x) = 2.303*A Log(x).

5 Measurement Uncertainty and Accreditation Documents

The maximum values of measurement uncertainty for the laboratory test equipment and facilities associated with each test are given in the table below. This uncertainty is computed for a 95.45% confidence level based on a coverage factor of $k = 2$.

Table 8: Measurement Uncertainty.

Measured Parameter	Measurement Uncertainty [†]
Radio Frequency	$\pm(f_{Mkr}/10^7 + RBW/10 + (SPN/(PTS - 1))/2 + 1 \text{ Hz})$
Conducted Emm. Amplitude	$\pm 1.9 \text{ dB}$
Radiated Emm. Amplitude (30 – 200 MHz)	$\pm 4.0 \text{ dB}$
Radiated Emm. Amplitude (200 – 1000 MHz)	$\pm 5.2 \text{ dB}$
Radiated Emm. Amplitude ($f > 1000 \text{ MHz}$)	$\pm 3.7 \text{ dB}$

[†]Ref: CISPR 16-4-2:2011+A1:2014

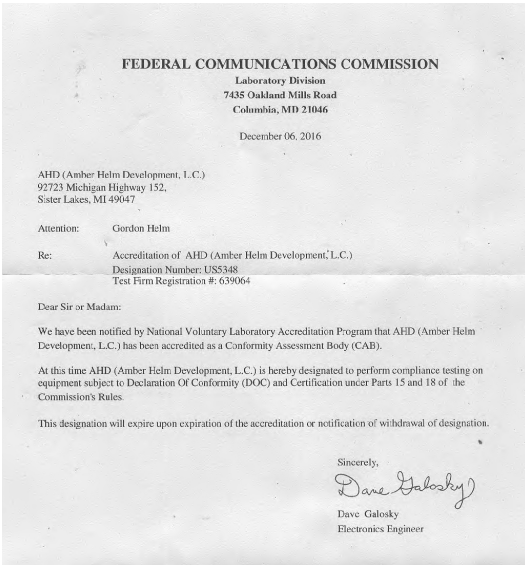


Figure 7: Accreditation Documents