

Report on the FCC and IC Testing of the IEE S.A.

Model: VitaSense

CFR 47, Part 15, Subpart C, §15.255 (partly)

Prepared for: IEE S.A.
1, rue du Campus
L-7795 Bissen
Luxembourg

FCC ID: NSZVITA001

COMMERCIAL-IN-CONFIDENCE

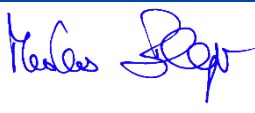
Date: 2021-04-16

Document Number: TR-06504-80561-10 | Issue: 1



Product Service

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RESPONSIBLE FOR	NAME	DATE	SIGNATURE
Project Management	Alex Fink	2021-04-16	 SIGN-ID 334148
Authorised Signatory	Markus Biberger	2021-04-16	 SIGN-ID 494893

Signatures in this approval box have checked this document in line with the requirements of TÜV SÜD Product Service document control rules.

ENGINEERING STATEMENT

The measurements shown in this report were made in accordance with the procedures described on test pages. All reported testing was carried out on a sample equipment to demonstrate limited compliance with FCC 47 CFR Part 15, Subpart C. The sample tested was found to comply with the requirements defined in the applied rules.

RESPONSIBLE FOR	NAME	DATE	SIGNATURE
Testing	Alex Fink	2021-04-16	 SIGN-ID 334148

Laboratory Accreditation

DAkkS Reg. No. D-PL-11321-11-02

DAkkS Reg. No. D-PL-11321-11-03

Laboratory recognition

Registration No. BNetzA-CAB-16/21-15

ISED Canada test site registration

3050A-2

EXECUTIVE SUMMARY

A sample of this product was tested and the performed tests found to be compliant with FCC 47 CFR Part 15, Subpart C, §15.255 (2020) (partly).

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Summary

Prüfergebnisse / <i>Test Results</i>		Auftragsnummer / <i>Order No.</i> 2001290205			
Die Prüfungen wurden nach folgenden Vorschriften durchgeführt: <i>Tests were performed according to:</i> CFR 47, Part 15, Subpart C, §15.255					
Durchgeführte Prüfung <i>Test performed</i>		Prüfergebnis <i>Test result</i>			
		Erfüllt <i>Passed</i>	Nicht erfüllt <i>Not Passed</i>	Nicht zutreffend <i>Not applicable</i>	Nicht durchgeführt <i>Not performed</i>
RF Exposure		☒	☐	☐	☐

Bemerkungen / Remarks:

The VitaSense device does not meet the technical requirements described in CFR 47, Part 15, Subpart C, §15.255. Particularly, the device does not meet the 500 MHz or less occupied bandwidth within the frequency band 61-61.5 GHz, described in B (2). This technical requirement was waived.

Die Prüfergebnisse beziehen sich ausschließlich auf das zur Prüfung vorgestellte Prüfmuster. Ohne schriftliche Genehmigung des Prüflabors darf der Prüfbericht auszugsweise nicht vervielfältigt werden. *The test results relate only to the individual item which has been tested. Without the written approval of the test laboratory this report may not be reproduced in extracts.*

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1 Administrative Data

Application details	
Applicant:	IEE S.A. 1, rue du Campus L-7795 Bissen Luxembourg
Order number:	Mr. Jochen LANDWEHR 2001290205
Receipt of EUT:	---
Return of EUT:	---
Date(s) of test:	2020-05-07 and 2021-03-29
Note(s):	---
Responsible for testing:	Mr. Alex Fink
Responsible for test report:	Mr. Alex Fink
Test report checked by:	Mr. Markus Biberger

Report details	
Report number:	TR-06504-80561-10
Edition:	1
Issue date:	2021-04-16

2 Details about the Test Laboratory

Details about the Test Laboratory	
Company name:	TÜV SÜD Product Service GmbH
Address:	Äußere Frühlingstraße 45 D-94315 Straubing Germany
Laboratory accreditation:	DAkKS Registration No. D-PL-11321-11-02 DAkKS Registration No. D-PL-11321-11-03
Laboratory recognition:	Registration No. BNetzA-CAB-16/21-15
Industry Canada test site registration:	3050A-2
Contact:	Mr. Markus Biberger
	Phone: +49 9421 5522-0 Fax: +49 9421 5522-99

3 Description of the Equipment Under Test

Equipment characteristics	
Type designation:	VitaSense
Parts of the system:	Main device: radar sensor
Options and accessories:	---
Type of equipment:	Radar Sensor
Serial number:	CZ-4100 #1
HVIN:	HW:330/1.00
Manufacturer:	IEE S.A.
Power supply:	Battery supply (regulated lead-acid) Nominal: 12.0 V Nominal frequency: 0 Hz (DC)
Highest internal frequency:	64 GHz for Radar
Version of EUT:	---

Marking Plate



4 Operation Mode and Configuration of EUT

Operation Mode(s)

12V DC supplied - Transmitting continuously

List of ports and cables

No.	Description	Classification ¹	Cable type	Cable length used	maximum ²
D1	DC 12 V supply	dc power	Unshielded	2 m	---
S1	Wiring harness (CAN, Ethernet)	signal/control port	Unshielded	2 m	---

List of devices connected to EUT

No.	Description	Type designation	Serial no. or ID	Manufacturer
1	USB CAN/LIN interface	VECTOR VN1610	007155002181	VECTOR

List of support devices

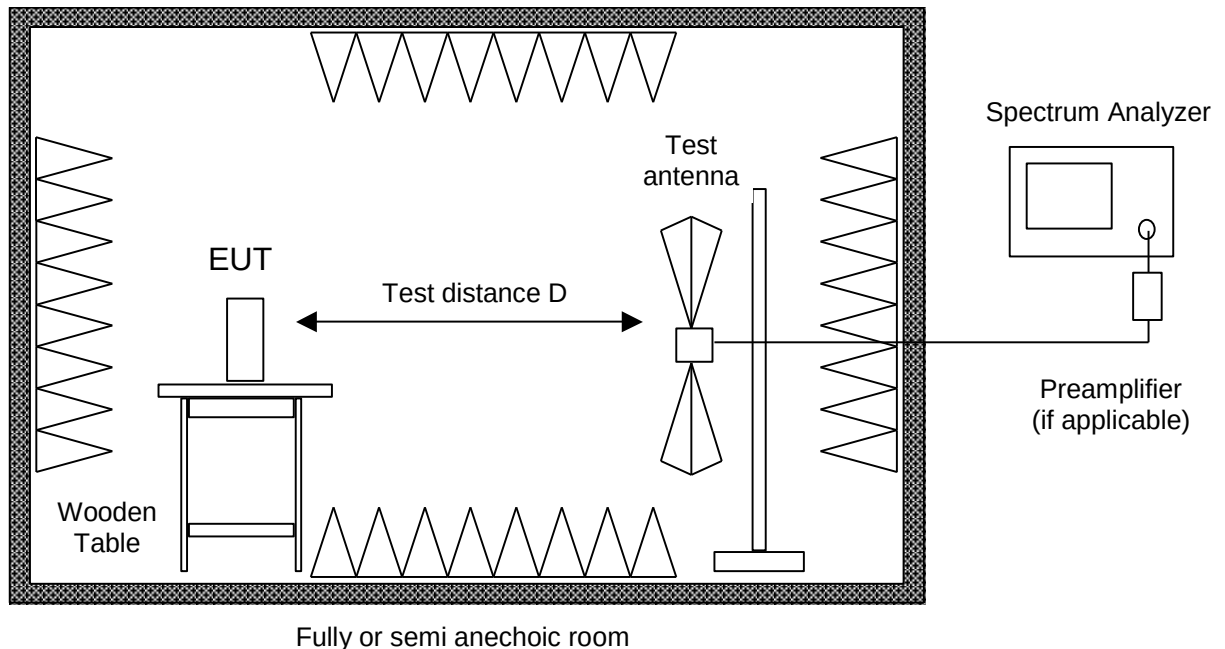
No.	Description	Type designation	Serial no. or ID	Manufacturer
1	USB CAN/LIN interface	VECTOR VN1610	007155002181	VECTOR

¹ Ports shall be classified as ac power, dc power or signal/control port.

² As specified by applicant

5 Test Setups

Radiated Emission in Fully or Semi Anechoic Room



Radiated emission in fully or semi anechoic room is measured in the frequency range from 30 MHz to the maximum frequency as specified in CFR 47 Part 15 section 15.33.

Measurements are made in both the horizontal and vertical planes of polarization using a spectrum analyzer with the detector function set to peak and resolution as well as video bandwidth set to 100 kHz (below 1 GHz) or 1 MHz (above 1 GHz).

Testing up to 1 GHz is performed with a linear polarized logarithmic periodic antenna combined with a 4:1 broadband dipole ("Trilog broadband antenna"). For testing above 1 GHz horn antennas are used.

All tests below 8.2 GHz are performed at a test distance D of 3 meters. For higher frequencies the test distance may be reduced (e.g. to 1 meter) due to the sensitivity of the measuring instrument(s) and the test results are calculated according to CFR 47 Part 15 section 15.31(f)(1) using an extrapolation factor of 20 dB/decade. If required, preamplifiers are used for the whole frequency range. Special care is taken to avoid overload, using appropriate attenuators and filters, if necessary.

If the radiated emission limits are expressed in terms of the average value of the emission there also is a peak limit corresponding to 20 dB above the maximum permitted average limit. Additionally, if pulsed operation is employed, the average field strength is determined by averaging over one complete pulse train, including blanking intervals, as specified in CFR 47 Part 15 section 15.35(c). If the pulse train exceeds 0.1 second that 0.1 second interval during which the value of the emission is at its maximum is selected for calculation. The pulse train correction is added to the peak value of the emission to get the average value.

Hand-held or body-worn devices are rotated through three orthogonal axes to determine which attitude and configuration produces the highest emission relative to the limit and therefore shall be used for final testing.

During testing the EUT is rotated all around to find the maximum levels of emissions. Equipment and cables are placed and moved within the range of position likely to find their maximum emissions.

For final testing below 1 GHz a semi anechoic room complying with the NSA requirements of ANSI C63.4 for alternative test sites is used (see 0). If prescans are recorded in fully anechoic room they are indicated appropriately.

According to section 13 of KDB558074 the requirement for radiated emissions on the band edges was performed with a reduced bandwidth of 100 kHz instead of 1 MHz.

Radiated emission in the frequency range 9 kHz to 30 MHz is measured using an active loop antenna. First the whole spectrum of emission caused by the equipment is recorded at a distance of 3 meters in a fully or semi anechoic room with the detector of the spectrum analyzer or EMI receiver set to peak. This configuration is also used for recording the spectrum of intentional radiators.

Hand-held or body-worn devices are rotated through three orthogonal axes to determine which attitude and configuration produces the highest emission relative to the limit and therefore shall be used for final testing.

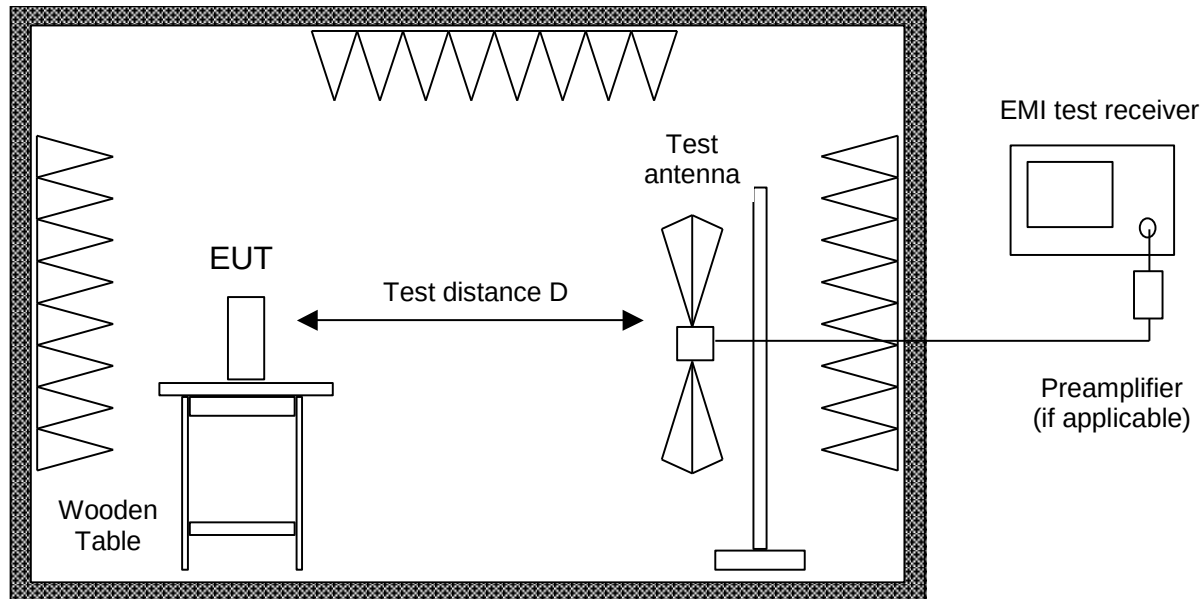
EUT is rotated all around to find the maximum levels of emissions. Equipment and cables are placed and moved within the range of position likely to find their maximum emissions.

If worst case emission of the EUT cannot be recorded with EUT in standard position and loop antenna in vertical polarization the EUT (or the radiating part of the EUT) is rotated by 90 degrees instead of changing the loop antenna to horizontal polarization. This procedure is selected to minimize the influence of the environment (e.g. effects caused by the floor especially with longer distances).

Final measurement is performed at a test distance D of 30 meters using an open field test site. In case the regulation requires testing at other distances, the result is extrapolated by either making measurements at an additional distance D of 10 meters to determine the proper extrapolation factor or by using the square of an inverse linear distance extrapolation factor (40 dB/decade). In cases of very low emissions measurements are performed at shorter distances and results are extrapolated to the required distance. The provisions of CFR 47 Part 15 sections 15.31(d) and (f)(2) apply. According to CFR 47 Part 15 section 15.209(d) final measurement is performed with detector function set to quasi-peak except for the frequency bands 9 to 90 kHz and 110 to 490 kHz where, for non-pulsed operation, average detector is employed.

If the radiated emission limits are expressed in terms of the average value of the emission there also is a peak limit corresponding to 20 dB above the maximum permitted average limit. Additionally, if pulsed operation is employed, the average field strength is determined by averaging over one complete pulse train, including blanking intervals, as specified in CFR 47 Part 15 section 15.35(c). If the pulse train exceeds 0.1 second that 0.1 second interval during which the value of the emission is at its maximum is selected for calculation. The pulse train correction is added to the peak value of the emission to get the average value.

Radiated Emission at Alternative Test Site



Alternate test site (semi anechoic room)

Radiated emission in the frequency range 30 MHz to 1 GHz is measured within a semi-anechoic room with groundplane complying with the NSA requirements of ANSI C63.4 for alternative test sites. A linear polarized logarithmic periodic antenna combined with a 4:1 broadband dipole ("Trilog broadband antenna") is used. The measurement bandwidth of the test receiver is set to 120 kHz with quasi-peak detector selected.

If the radiated emission limits are expressed in terms of the average value of the emission there also is a peak limit corresponding to 20 dB above the maximum permitted average limit. Additionally, if pulsed operation is employed, the average field strength is determined by averaging over one complete pulse train, including blanking intervals, as specified in CFR 47 Part 15 section 15.35(c). If the pulse train exceeds 0.1 second that 0.1 second interval during which the value of the emission is at its maximum is selected for calculation. The pulse train correction is added to the peak value of the emission to get the average value.

Hand-held or body-worn devices are tested in the position producing the highest emission relative to the limit as verified by prescans in fully anechoic room.

If no prescan in a fully anechoic room is used first a peak scan is performed in four positions to get the whole spectrum of emission caused by EUT with the measuring antenna raised and lowered from 1 to 4 m to find table position, antenna height and antenna polarization for the maximum emission levels.

Data reduction is applied to these results to select those levels having less margin than 10 dB to or exceeding the limit using subranges and limited number of maximums. Further maximization is following.

With detector of the test receiver set to quasi-peak final measurements are performed immediately after frequency zoom (for drifting disturbances) and maximum adjustment.

Equipment and cables are placed and moved within the range of position likely to find their maximum emissions.

In cases where prescans in a fully anechoic room are taken (e. g. if EUT is operating for a short time only or battery is discharged quickly) final measurements with quasi-peak detector are performed manually at frequencies indicated by prescan with EUT rotating all around and receiving antenna raising and lowering within 1 meter to 4 meters to find the maximum levels of emission.

Equipment and cables are placed and moved within the range of position likely to find their maximum emissions.

For measuring emissions of intentional radiators and receivers a test distance D of 3 meters is selected. Testing of unintentional radiators is performed at a distance of 10 meters. If limits specified for 3 meters shall be used for measurements performed at 10 meters distance the limits are calculated according to CFR 47 Part 15 section 15.31(d) and (f)(1) using an inverse linear-distance extrapolation factor of 20 dB/decade.

6 Referenced Regulations

<i>Publication</i>	<i>Title</i>
CFR 47, Part 2	Code of Federal Regulations Part 2 (Frequency allocation and radio treaty matters; General rules and regulations) of the Federal Communications Commission (FCC)
CFR 47, Part 15, Subpart C	Code of Federal Regulations Part 15 (Personal Radio Services), Subpart C (Intentional Radiators) of the Federal Communications Commission (FCC)
RSS-102, Issue 5	Radio Frequency (RF) Exposure Compliance of Radiocommunication Apparatus (All Frequency Bands)
ANSI C63.4-2014	American National Standard for 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	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices

7 Measurement Uncertainty Values

For a 95% confidence level, the measurement uncertainties for defined systems are:

Radio Testing			
Test Name	kp	Expanded Uncertainty	Note
Occupied Bandwidth	2.0	±1.14 %	2
RF-Frequency error	1.96	±1 · 10 ⁻⁷	7
RF-Power, conducted carrier	2	±0.079 dB	2
RF-Power uncertainty for given BER	1.96	+0.94 dB / -1.05	7
RF power, conducted, spurious emissions	1.96	+1.4 dB / -1.6 dB	7
RF power, radiated			
25 MHz – 4 GHz	1.96	+3.6 dB / -5.2 dB	8
1 GHz – 18 GHz	1.96	+3.8 dB / -5.6 dB	8
18 GHz – 26.5 GHz	1.96	+3.4 dB / -4.5 dB	8
40 GHz – 170 GHz	1.96	+4.2 dB / -7.1 dB	8
Spectral Power Density, conducted	2.0	±0.53 dB	2
Maximum frequency deviation			
300 Hz – 6 kHz	2	±2,89 %	2
6 kHz – 25 kHz	2	±0.2 dB	2
Maximum frequency deviation for FM	2	±2,89 %	2
Adjacent channel power 25 MHz – 1 GHz	2	±2.31 %	2
Temperature	2	±0.39 K	4
(Relative) Humidity	2	±2.28 %	2
DC- and low frequency AC voltage			
DC voltage	2	±0.01 %	2
AC voltage up to 1 kHz	2	±1.2 %	2
Time	2	±0.6 %	2

Radio Interference Emission Testing			
Test Name	kp	Expanded Uncertainty	Note
Conducted Voltage Emission			
9 kHz to 150 kHz (50Ω/50μH AMN)	2	± 3.8 dB	1
150 kHz to 30 MHz (50Ω/50μH AMN)	2	± 3.4 dB	1
100 kHz to 200 MHz (50Ω/5μH AMN)	2	± 3.6 dB	1
Discontinuous Conducted Emission			
9 kHz to 150 kHz (50Ω/50μH AMN)	2	± 3.8 dB	1
150 kHz to 30 MHz (50Ω/50μH AMN)	2	± 3.4 dB	1
Conducted Current Emission			
9 kHz to 200 MHz	2	± 3.5 dB	1
Magnetic Fieldstrength			
9 kHz to 30 MHz (with loop antenna)	2	± 3.9 dB	1
9 kHz to 30 MHz (large-loop antenna 2 m)	2	± 3.5 dB	1
Radiated Emission			
Test distance 1 m (ALSE)			
9 kHz to 150 kHz	2	± 4.6 dB	1
150 kHz to 30 MHz	2	± 4.1 dB	1
30 MHz to 200 MHz	2	± 5.2 dB	1
200 MHz to 2 GHz	2	± 4.4 dB	1
2 GHz to 3 GHz	2	± 4.6 dB	1
Test distance 3 m			
30 MHz to 300 MHz	2	± 4.9 dB	1
300 MHz to 1 GHz	2	± 5.0 dB	1
1 GHz to 6 GHz	2	± 4.6 dB	1
Test distance 10 m			
30 MHz to 300 MHz	2	± 4.9 dB	1
300 MHz to 1 GHz	2	± 4.9 dB	1
Radio Interference Power			
30 MHz to 300 MHz	2	± 3.5 dB	1
Harmonic Current Emissions			4
Voltage Changes, Voltage Fluctuations and Flicker			4

Immunity Testing			
Test Name	kp	Expanded Uncertainty	Note
Electrostatic Discharges			4
Radiated RF-Field			
Pre-calibrated field level	2	+32.2 / -24.3 %	5
Dynamic feedback field level	2.05	+21.2 / -17.5 %	3
Electrical Fast Transients (EFT) / Bursts			4
Surges			4
Conducted Disturbances, induced by RF-Fields			
via CDN	2	+15.1 / -13.1 %	6
via EM clamp	2	+42.6 / -29.9 %	6
via current clamp	2	+43.9 / -30.5 %	6
Power Frequency Magnetic Field	2	+20.7 / -17.1 %	2
Pulse Magnetic Field			4
Voltage Dips, Short Interruptions and Voltage Variations			4
Oscillatory Waves			4
Conducted Low Frequency Disturbances			
Voltage setting	2	± 0.9 %	2
Frequency setting	2	± 0.1 %	2
Electrical Transient Transmission in Road Vehicles			4

Note 1:

The expanded uncertainty reported according to CISPR 16-4-2:2003-11 is based on a standard uncertainty multiplied by a coverage factor of $k_p = 2$, providing a level of confidence of $p = 95.45\%$

Note 2:

The expanded uncertainty reported according to UKAS Lab 34 (Edition 1, 2002-08) is based on a standard uncertainty multiplied by a coverage factor of $k_p = 2$, providing a level of confidence of $p = 95.45\%$

Note 3:

The expanded uncertainty reported according to UKAS Lab 34 (Edition 1, 2002-08) is based on a standard uncertainty multiplied by a coverage factor of $k_p = 2.05$, providing a level of confidence of $p = 95.45\%$

Note 4:

It has been demonstrated that the used test equipment meets the specified requirements in the standard with at least a 95% confidence.

Note 5:

The expanded uncertainty reported according to IEC 61000-4-3 is based on a standard uncertainty multiplied by a coverage factor of $k_p = 2$, providing a level of confidence of $p = 95.45\%$

Note 6:

The expanded uncertainty reported according to IEC 61000-4-6 is based on a standard uncertainty multiplied by a coverage factor of $k_p = 2$, providing a level of confidence of $p = 95.45\%$

Note 7:

The expanded uncertainty reported according ETSI TR 100 028 V1.4.1 (all parts) to is based on a standard uncertainty multiplied by a coverage factor of $k_p = 1.96$, providing a level of confidence of $p = 95.45\%$

Note 8:

The expanded uncertainty reported according to ETSI TR 102 273 V1.2.1 (all parts) is based on a standard uncertainty multiplied by a coverage factor of $k_p = 1.96$, providing a level of confidence of $p = 95.45\%$

8 Test Equipment used

Instrument	Manufacturer	Type No	TE No	Calibration Period (months)	Calibration Due
Signal and Spectrum Analysator	Rohde & Schwarz	FSV40 for TS8997	20219	24	2022-01-31
Waveguide mixer	Rohde&Schwarz	FS-Z90	25850	36	2023-02-28
EMC measurement software	Rohde&Schwarz	EMC32 V10.50.10	42986	N/A	N/A

TU - Traceability Unscheduled

O/P Mon – Output Monitored using calibrated equipment

N/A - Not Applicable

9 Test Results

RSS-102, Issue 5			
Section(s)	Test performed	Page	Test Result
4 Table 4	RF Exposure	17	Test passed

9.1 RF Exposure

Date of Test	2021-04-12	Test Result ☒ Passed ☐ Not Passed
Operator	Alex Fink	
Test Site	Semi anechoic room, cabin no. 11	

Barometric pressure:	975 hPa
Relative humidity:	29 %
Ambient temperature:	22 °C

Specifications:	CFR 47, Part 15, Subpart C, §15.255(g) CFR 47, Part 1, Subpart I, §15.1310
Description:	SAR evaluation is required if the separation distance between the user and/or bystander and the antenna and/or radiating element of the device is less than or equal to 20 cm, except when the device operates at or below the applicable output power level for the specified separation distance. Output power level shall be the higher of the maximum conducted or equivalent isotropically radiated power (e.i.r.p.) source-based, time-averaged output power.
Operation mode: Comment:	12V DC supplied - Transmitting continuously The applicant declared a evaluation distance of 2.69 cm. and an antenna gain for 7.5 dBi and 6.4 dBi for two zones of the antenna. For re-calculating the conducted power, the lowest value of antenna gain was used to cover the potential worst case.

Conducted transmit power calculation:

Measured maximum EIRP:	8.96 dBm = 7.87 mW
Duty Cycle for EUT:	100 % · 2.442 ms / 62.530 ms = 3.9 %
Calculated maximum average EIRP:	-5.13 dBm = 0.31 mW
Antenna gain :	6.4 dBi = 4.37
Calculated maximumm conducted power with duty cycle :	-11.53 dBm = 0.070 mW

The EUT complies with 1 mW blanket exemption as one of the exemption criteria for single RF source exemptions from RF exposure evaluation requirements.

10 Revision History

Revision History			
<i>Edition</i>	<i>Date</i>	<i>Issued by</i>	<i>Modifications</i>
1	2021-04-16	Alex Fink	First Edition