

Report on the FCC and IC Testing of the RMs Legic SM-6300 (BLE)

In accordance with FCC 47 CFR Part 15C and
ISED RSS-210 and ISED RSS-GEN

Prepared for: dormakaba EAD GmbH
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Germany

FCC ID: NVI-LEGBLE
IC: 11038A-LEGBLE



Product Service

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Date: 2020-06-05

Document Number: TR-69547-72895-04 | Issue: 02

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Authorised Signatory	Alex Fink	2020-06-05	 SIGN-ID 366239

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 15C and ISED RSS-210 and ISED RSS-GEN. The sample tested was found to comply with the requirements defined in the applied rules.

RESPONSIBLE FOR	NAME	DATE	SIGNATURE
Testing	Martin Steindl	2020-06-05	 SIGN-ID 366236

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 test site registration 3050A-2

EXECUTIVE SUMMARY

A sample of this product was tested and found to be compliant with FCC 47 CFR Part 15C, ISED RSS-210, Issue 09 (08-2016) and ISED RSS-GEN, Issue 05 (03-2019). See section 1.6.

Trade Register Munich
HRB 85742
VAT ID No. DE129484267
Information pursuant to Section 2(1)
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1 Report Summary

1.1 Report Modification Record

Alterations and additions to this report will be issued to the holders of each copy in the form of a complete document.

Issue	Description of Change	Date of Issue
1	First Issue	2019-12-03
2	Updated to RSS-Gen, Issue 5 and added RF exposure calculation according to KDB 447498 D01	2020-06-05

Table 1

1.2 Introduction

Applicant	dormakaba EAD GmbH
Manufacturer	dormakaba EAD GmbH
Model Number(s)	RMs Legic SM-6300
Serial Number(s)	04047503
Hardware Version(s)	---
Software Version(s)	---
Number of Samples Tested	1
Test Specification/Issue/Date	FCC 47 CFR Part 15 C and ISED RSS-210, Issue 09 (08-2016) and ISED RSS-GEN, Issue 05 (03-2019)
Test Plan/Issue/Date	---
Order Number	200323
Date	2019-10-14
Date of Receipt of EUT	2019-10-14
Start of Test	2019-10-15
Finish of Test	2019-10-15
Name of Engineer(s)	Martin Steindl
Related Document(s)	ANSI C63.10 (2013)



1.3 Brief Summary of Results

A brief summary of the tests carried out in accordance with FCC 47 CFR Part 15C and ISED RSS-210 and ISED RSS-GEN is shown below.

Section	Specification Clause	Test Description	Result	Comments/Base Standard
Configuration and Mode: Transmitting continuously and waiting for badge (RFID card)				
3.1	15.215 (c); --- ; 6.7	Occupied Bandwidth	Pass	ANSI C63.10 (2013)
3.2	15.225 (a)(b)(c)(d); B.6; 6.13	Field Strength of any Emission	Pass	ANSI C63.10 (2013)
3.3	15.225 (e); B.6; ---	Frequency Tolerance Under Temperature Variations	Pass	ANSI C63.10 (2013)
3.4	15.207; ---; 8.8	AC Power Line Conducted Emissions	Pass	ANSI C63.10 (2013)

Table 2



1.4 Declaration of Build Status

General information (for report)	
Ordernumber (your PO number)	200323
Brand	---
Applicant (incl. address and contact person)	dormakaba EAD GmbH Albertistraße 3 78056 Villingen-Schwenningen Thomas Jerger, Hardware Development
Manufacturer (when different to applicant)	dormakaba EAD GmbH Albertistraße 3 78056 Villingen-Schwenningen
Name and address of factory(ies)	dormakaba EAD GmbH Albertistraße 3 78056 Villingen-Schwenningen

Table 3



Equipment characteristics:			
Type of equipment:	RFID and BLE reader module		
Type designation*: (For IC „MN:“)	RMs Legic SM-6300 (BLE)		
Parts of the system:	No system		
Version of EUT: In case of already tested products please describe the differences to the original sample	---		
Serial number:	04047503		
Modulation Method:	amplitude-shift keying (ASK) modulation		
Emission Designator:	10K0A1D		
Antenna Type	---		
Antenna Gain	Will be find out during tests for certification		
Power supply:	☐ AC Nominal: 100V - 240V Minimum: 90V Maximum: 264V Nominal frequency: 50/60Hz	☒ DC Nominal: 5 V DC	☐ Battery Nominal: V
highest frequency generated or used within the EUT	max. 13.56 MHz (RFID) max. 2483 MHz (BLE/Bluetooth) ☐ < 108 MHz		

Table 4

Marking plate

Table 5



1.5 Product Information

1.5.1 Technical Description

RFID and BLE reader module connected to the Terminal 97 00 with a 80 cm reader flatcable (Terminal in shielded metal box), HR30 or TP application running, waiting for tag.

Supply voltage: 207 V AC to 253 V AC

Temperature range: 0°C to 50°C

Carrier frequency: 13,56 MHz (RFID) and 2402 MHz to 2480 MHz (BLE)

1.5.2 Test Configuration

Configuration	Description
DC powered	Connected to power supply 5 V DC

Table 6

1.5.3 Modes of Operation

Mode	Description
Normal mode of operation	Connected to the Terminal 97 00 with a 80cm reader flatcable (Terminal in shielded metal box); HR30 or TP application running; waiting for tag; transmitting continuously

Table 7

1.6 Deviations from the Standard

none



1.7 EUT Modification Record

The table below details modifications made to the EUT during the test programme.
The modifications incorporated during each test are recorded on the appropriate test pages.

Modification State	Description of Modification still fitted to EUT	Modification Fitted By	Date Modification Fitted
Model: RMs Legic SM-6300- Serial Number: 04047503			
0	As supplied by the customer	Not Applicable	Not Applicable

Table 8

1.8 Test Location

TÜV SÜD Product Service conducted the following tests at our Straubing Test Laboratory.

Test Name	Name of Engineer(s)
Configuration and Mode: Transmitting continuously	
20 dB Bandwidth	Martin Steindl
Field Strength of any Emission	Martin Steindl
Frequency Tolerance Under Temperature Variations	Martin Steindl
AC Power Line Conducted Emissions	Martin Steindl
Exposure of Humans to RF Fields	Martin Steindl

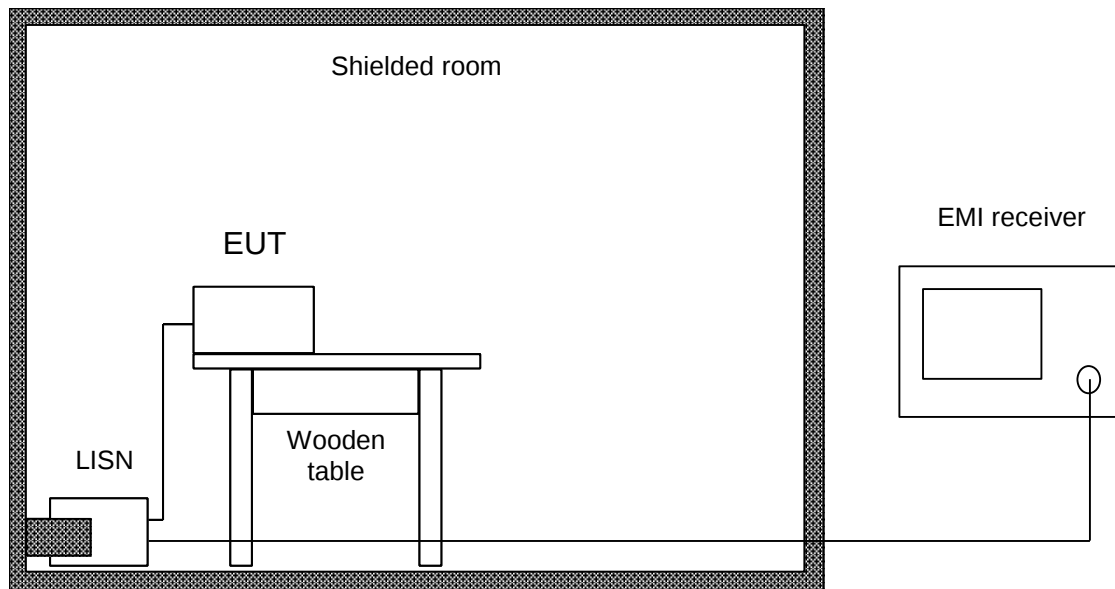
Table 9

Office Address:

Äußere Frühlingstraße 45
94315 Straubing
Germany

2 Test Setups

2.1 Conducted AC emissions

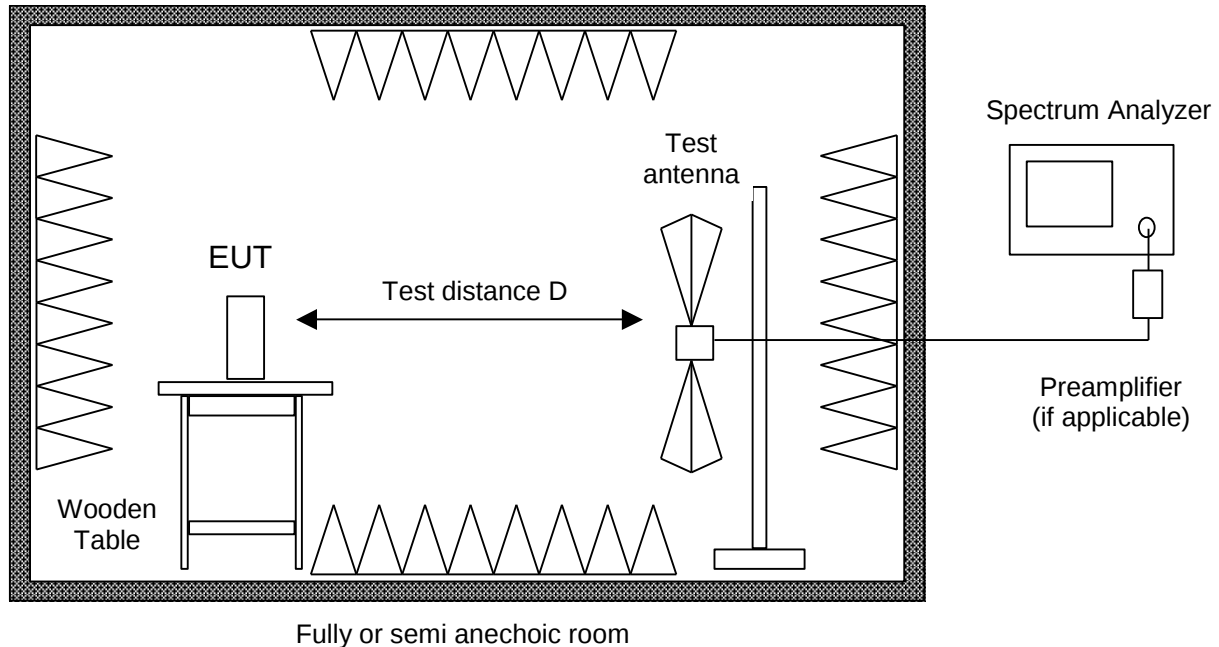


Conducted emission tests in the frequency range 150 kHz to 30 MHz are performed using Line Impedance Stabilization Networks (LISNs). To simplify testing with quasi-peak and average detector the following procedure is used:

First the whole spectrum of emission caused by the equipment under test (EUT) is recorded with detector set to peak using CISPR bandwidth of 10 kHz. After that all emission levels having less margin than 10 dB to or exceeding the average limit are retested with detector set to quasi-peak. If average limit is kept with quasi-peak levels no additional scan with average detector is necessary. In cases of emission levels between quasi-peak and average limit an additional scan with detector set to average is performed.

According to ANSI C63.10, section 6.2.5, testing of intentional radiators with detachable antenna shall be performed using a suitable dummy load connected to the antenna output terminals. Otherwise, the tests shall be made with the antenna connected and, if adjustable, fully extended. Testing with dummy load may be necessary to distinguish (unintentional) conducted emissions on the supply lines from (intentional) emissions radiated by the antenna and coupling directly to supply lines and/or LISN. Usage of dummy load has to be stated in the appropriate test record(s) and notes should be added to clarify the test setup.

2.2 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 2.3). 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.

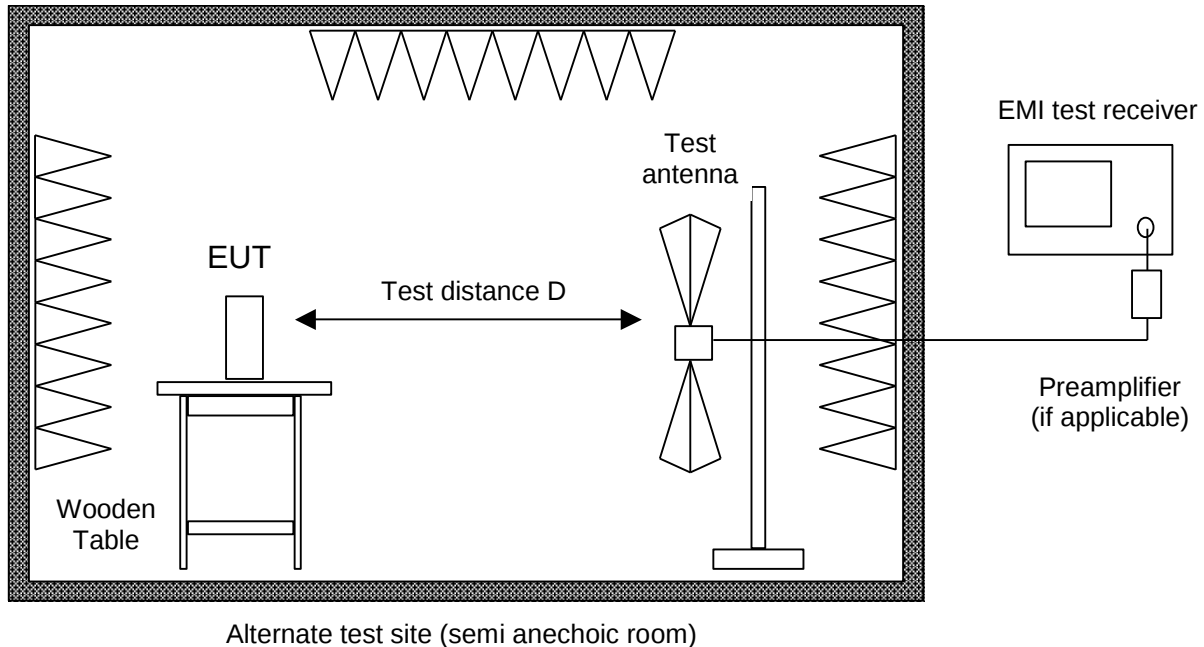
EUT is rotated all around to find the maximum levels of emissions. Equipment and cables are placed and moved within the range of position likely to find their maximum emissions.

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.

2.3 Radiated Emission at Alternative Test Site



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.



Product Service

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.



3 Test Details

3.1 Occupied Bandwidth

3.1.1 Specification Reference

FCC 47 CFR Part 15C, Clause 15.215 (c),
ISED RSS-GEN, Issue 9, Section 6.7

3.1.2 Equipment Under Test and Modification State

RM's Legic SM-6300, Serial Number: 04047503, Modification State: 0

3.1.3 Date of Test

2019-10-14

3.1.4 Test Method

The test was performed in accordance with ANSI C63.10, clause 6.9.1.

3.1.5 Environmental Conditions

Ambient Temperature 23.0 °C
Relative Humidity 51.0 %

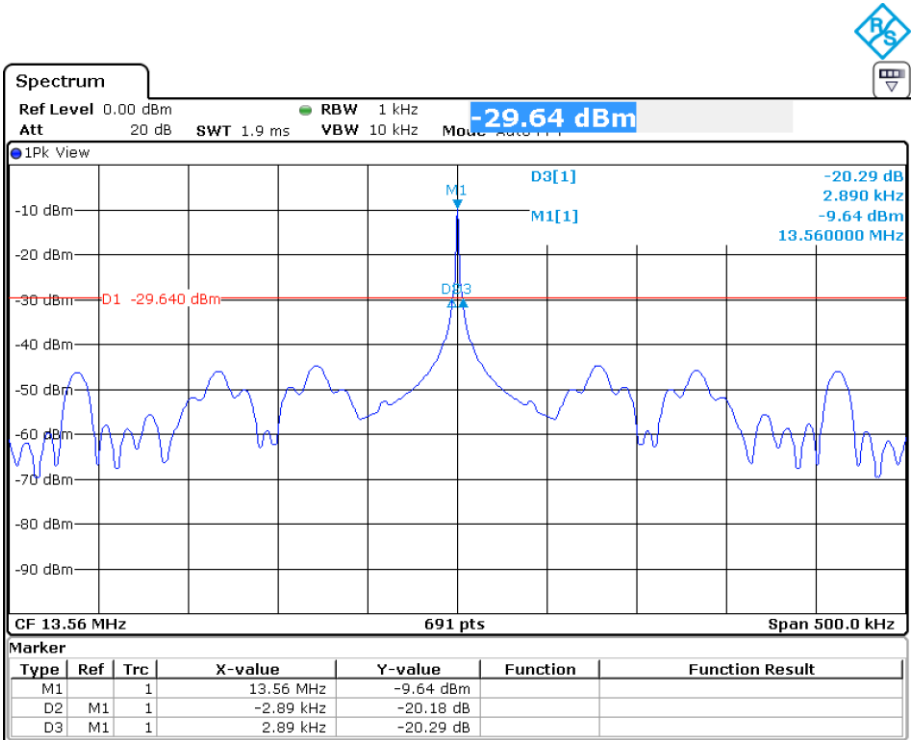
3.1.6 Test Results

Frequency (MHz)	20 dB Bandwidth (kHz)	99% Occupied Bandwidth (kHz)	F _{LOWER} (MHz)	F _{UPPER} (MHz)
13.56	5.78	2 kHz	13.55424	13.5629

Table 10

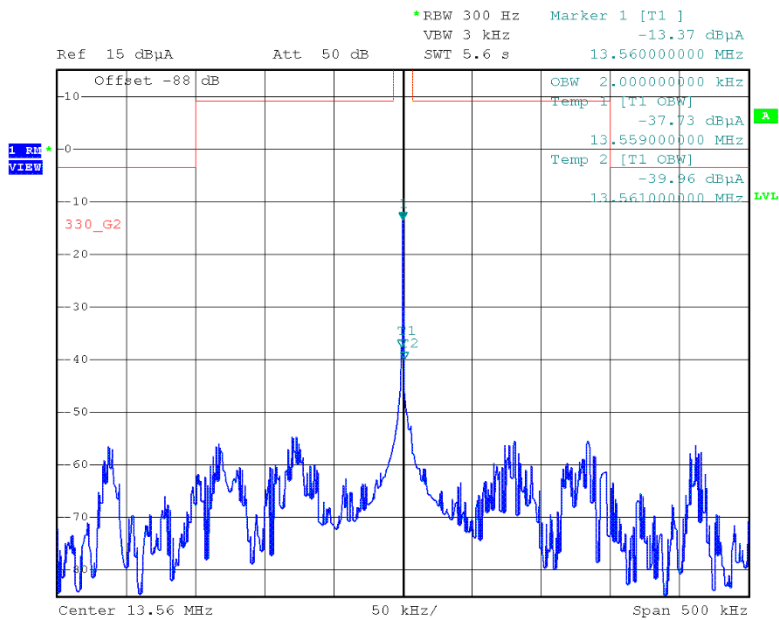


Product Service



Date: 2.DEC.2019 10:17:25

Figure 1 – 20 dB Bandwidth



Date: 16.OCT.2019 09:52:52

Figure 2 – 99 % Bandwidth



FCC 47 CFR Part 15, Limit Clause 15.215 (c)

The 20 dB bandwidth of the emission, or whatever bandwidth may otherwise be specified in the specific rule section under which the equipment operates, is contained within the frequency band designated in the rule section under which the equipment is operated.

ISED RSS 210 and ISED RSS GEN, Limit Clause

Not specified

3.1.7 Test Location and Test Equipment Used

This test was carried out in Non shielded room.

Instrument	Manufacturer	Type No	TE No	Calibration Period (months)	Calibration Due
Spectrum Analyzer	Rohde & Schwarz	FSV40	20219	12	2020-01-31
Climatic test chamber	ESPEC	ARS-1100-5	40116	36	2022-03-31

Table 11

TU - Traceability Unscheduled

O/P Mon – Output Monitored using calibrated equipment

N/A - Not Applicable



3.2 Field Strength of any Emission

3.2.1 Specification Reference

FCC 47 CFR Part 15C, Clause 15.225 (a)(b)(c)(d); and
ISED RSS-210; Clause B.1 to B.9 and
ISED RSS-GEN, clause 6.4 and 6.5.

3.2.2 Equipment Under Test and Modification State

RMs Legic SM-6300, Serial Number: 04047503, Modification State: 0

3.2.3 Date of Test

2019-10-15

3.2.4 Test Method

See section 2 of this test report for details.

3.2.5 Environmental Conditions

Ambient Temperature	23.0 °C
Relative Humidity	51.0 %



3.2.6 Test Results

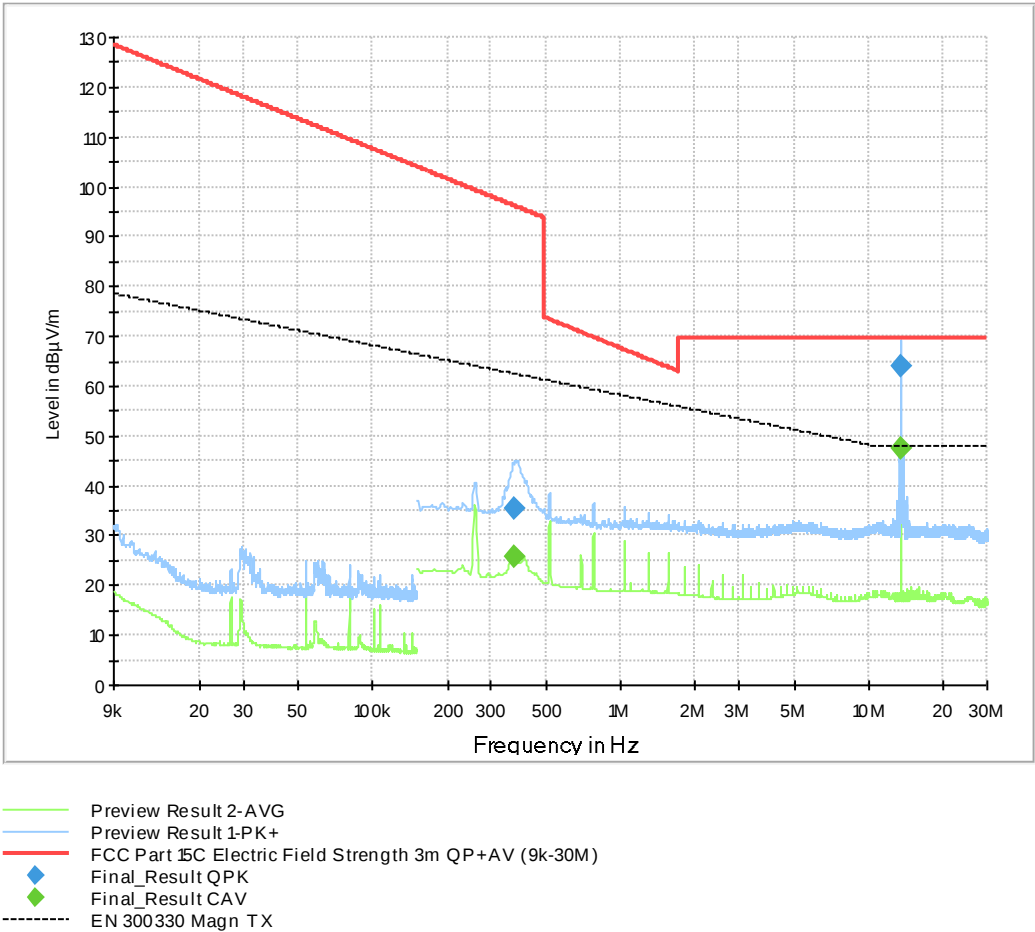


Figure 3 – 9kHz to 30MHz

Extrapolation factor: -40 dB/decade										
Frequency	Detector	Distance		Reading	Correction	Extrapolation	Pulse Train	Final	Limit	Margin
(MHz)		d1	d	Value	Factor	Factor	Correction	Value	(dBµV/m)	(dB)
		(m)	(m)	(dBµV)	(dB/m)	(dB)	(dB)	(dBµV/m)		
0.37275	Average	3	300	5.7	20.0	-80.0		-54.3	16.2	70.5
13.56000	Quasi-Peak	3	30	43.9	20.0	-40.0		23.9	84.0	60.1

Table 12 - Emissions Results – 9 kHz to 30 MHz

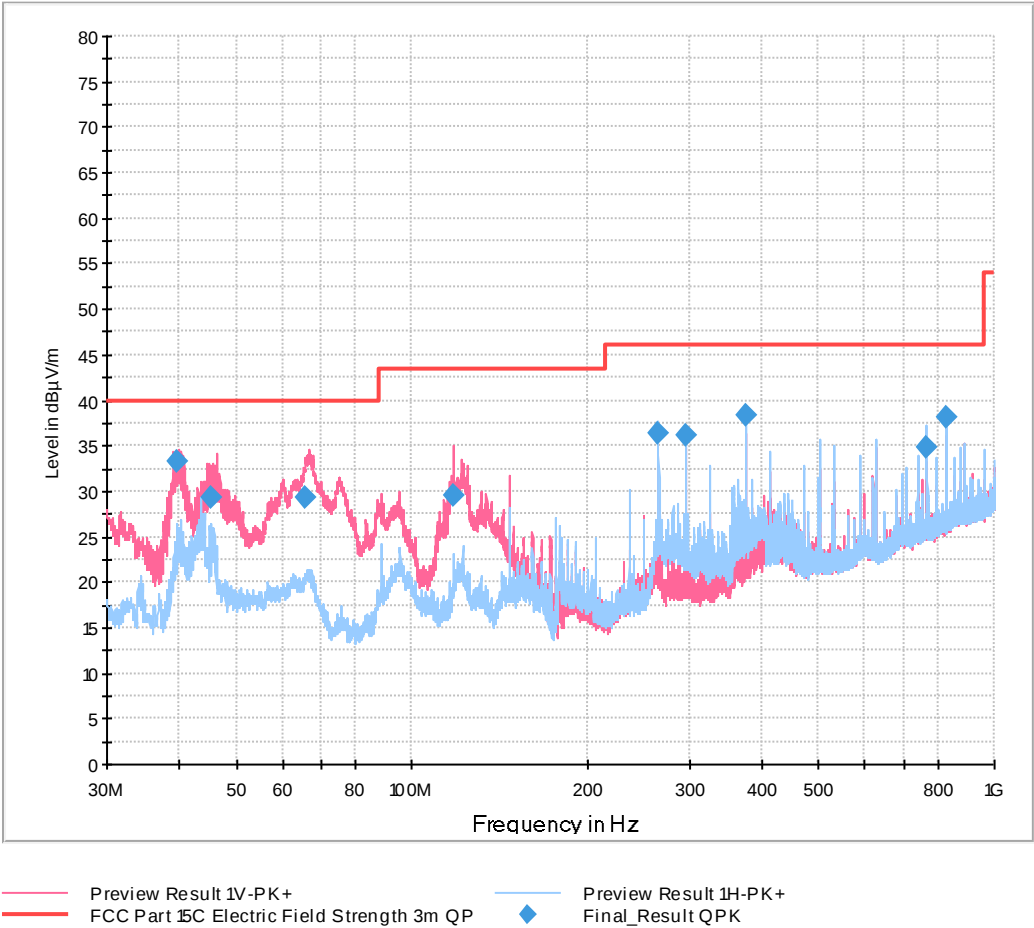


Figure 4 –30MHz – 1 GHz

Frequency	QuasiPeak	Limit	Margin	Meas. Time	Bandwidth	Height	Pol	Azimuth	Corr.
MHz	dBµV/m	dBµV/m	dB	ms	kHz	cm		deg	dB/m
39.570000	33.28	40.00	6.72	1000.0	120.000	117.0	V	-60.0	12.7
45.300000	29.33	40.00	10.67	1000.0	120.000	124.0	V	-75.0	14.1
65.700000	29.22	40.00	10.78	1000.0	120.000	140.0	V	218.0	12.0
117.990000	29.60	43.50	13.90	1000.0	120.000	100.0	V	-131.0	10.6
265.500000	36.31	46.02	9.71	1000.0	120.000	111.0	H	94.0	14.1
294.990000	36.08	46.02	9.94	1000.0	120.000	107.0	H	62.0	14.4
375.000000	38.28	46.02	7.74	1000.0	120.000	104.0	H	-126.0	16.3
766.950000	34.79	46.02	11.23	1000.0	120.000	103.0	H	119.0	22.8
825.960000	38.22	46.02	7.80	1000.0	120.000	102.0	H	104.0	23.7

Table 13 - Emissions Results – 30 MHz to 1 GHz



FCC 47 CFR Part 15, Limit Clause 15.225 (a)(b)(c)(d)

- (a) The field strength of any emissions within the band 13.553–13.567 MHz shall not exceed 15,848 microvolts/meter at 30 m.
- (b) Within the bands 13.410–13.553 MHz and 13.567–13.710 MHz, the field strength of any emissions shall not exceed 334 microvolts/meter at 30 m.
- (c) Within the bands 13.110–13.410 MHz and 13.710–14.010 MHz the field strength of any emissions shall not exceed 106 microvolts/meter at 30 m.
- (d) The field strength of any emissions appearing outside of the 13.110–14.010 MHz band shall not exceed the general radiated emission limits in § 15.209.

FCC 47 CFR Part 15, Limit Clause 15.209

Frequency (MHz)	Field Strength (μV/m)	Measurement Distance (m)
0.009 to 0.490	2400/F (kHz)	300
0.490 to 1.705	24000/F (kHz)	30
1705 to 30	30	30
30 to 88	100**	3
88 to 216	150**	3
216 to 960	200**	3
Above 960	500	5

Table 10 - FCC Radiated Emission Limit

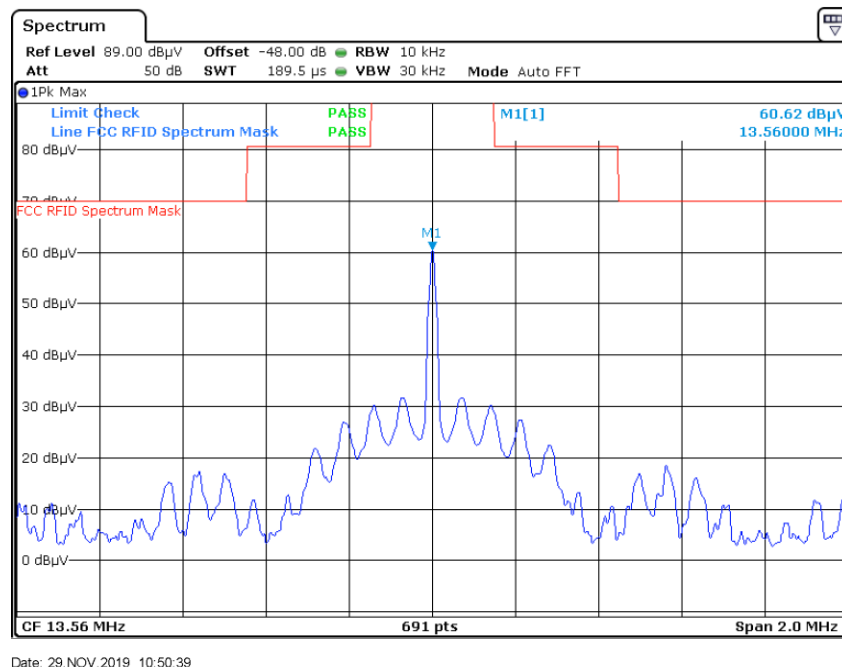


Figure 5 – Spectrum mask acc. To FCC15.225



ISED RSS-210, Limit Clause B.6

The field strength of any emission shall not exceed the following limits:

- (a) 15.848 mW/m (84 dBμV/m) at 30 m, within the band 13.553 – 13.567 MHz.
- (b) 334 μV/m (50.5 dBμV/m) at 30 m, within the bands 13.410 – 13.553 MHz and 13.567 – 13.710 MHz.
- (c) 106 μV/m (40.5 dBμV/m) at 30 m, within the bands 13.110 – 13.410 MHz and 13.710 – 14.010 MHz.
- (d) RSS-GEN general field strength limits for frequencies outside the band 13.110 – 14.010 MHz.

ISED RSS-GEN, Limit Clause

Frequency	Electric Field Strength (μV/m)	Magnetic Field Strength (H-Field) (μA/m)	Measurement Distance (m)
9 - 490 kHz	2,400/F (F in kHz)	2,400/377F (F in kHz)	300
490 - 1,705 kHz	24,000/F (F in kHz)	24,000/377F (F in kHz)	30
1,705 kHz - 30 MHz	30	N/A	30

Table 14 - ISED Radiated Emission Limit - Less than 30 MHz

Frequency (MHz)	Field Strength (μV/m at 3 m)
30 - 88	100
88 - 216	150
216 - 960	200
> 960	500

Table 15 - ISED Radiated Emission Limit - 30 MHz to 1 GHz

3.2.7 Test Location and Test Equipment Used

This test was carried out in Non shielded room and Semi anechoic room - cabin no. 8.

Instrument	Manufacturer	Type No	T-ID	Calibration Period (months)	Calibration Due
Loop antenna	Rohde & Schwarz	HFH2-Z2	18876	36	2022-08-31
TRILOG Antenna	Schwarzbeck	VULB 9163	19691	24	2020-12-31
EMI test receiver	Rohde & Schwarz	ESW26	28268	12	2020-06-30
Test Software	Rohde & Schwarz	EMC32 – v10.50.10	19927	NA	NA

Table 16

TU - Traceability Unscheduled
O/P Mon – Output Monitored using calibrated equipment
N/A - Not Applicable



3.3 Frequency Tolerance Under Temperature and Voltage Variations

3.3.1 Specification Reference

FCC 47 CFR Part 15C, ISED RSS-210 and ISED RSS-GEN, Clause 15.225 (e), B.1 to B.9 and 6.11.

3.3.2 Equipment Under Test and Modification State

RMs Legic SM-6300, Serial Number: 04047503, Modification State: 0

3.3.3 Date of Test

2019-10-16

3.3.4 Test Method

3.3.5 Environmental Conditions

Ambient Temperature	23.0 °C
Relative Humidity	31.0 %

3.3.6 Test Results



Temperature	Voltage	Measured Frequency (MHz)	Frequency Deviation (Hz)	Frequency Error (ppm)
-20.0 °C	120 V	13.560092	+144	+10.6
-10.0 °C	120 V	13.560112	+164	+12.1
0.0 °C	120 V	13.560100	+152	+11.2
+10.0 °C	120 V	13.560072	+124	+9.1
+20.0 °C	120 V	13.559948	0	0.0
+30.0 °C	120 V	13.559980	+32	+2.4
+40.0 °C	120 V	13.559932	-16	-1.2
+50.0 °C	120 V	13.559896	-52	-3.8

Table 17 - Frequency Tolerance Under Temperature Variation

Temperature	Voltage	Measured Frequency (MHz)	Frequency Deviation (Hz)	Frequency Error (ppm)
+20.0 °C	102	13.559952	0	0
+20.0 °C	120	13.559952	0	0
+20.0 °C	138	13.559952	0	0

Table 18 - Frequency Tolerance Under Voltage Variation



FCC 47 CFR Part 15, Limit Clause 15.225 (e)

The frequency tolerance of the carrier signal shall be maintained within ± 0.01 % of the operating frequency.

ISED RSS-210, Limit Clause B.6

Carrier frequency stability shall be maintained to $\pm 0.01\%$ (± 100 ppm)

3.3.7 Test Location and Test Equipment Used

This test was carried out in Non shielded room.

Instrument	Manufacturer	Type No	TE No	Calibration Period (months)	Calibration Due
Signal Analyzer	Rohde & Schwarz	FSV 40	20219	36	2020-01-31
Climatic test chamber	ESPEC	ARS-1100-5	40116	36	2022-03-31

Table 19

TU - Traceability Unscheduled

O/P Mon – Output Monitored using calibrated equipment

N/A - Not Applicable



3.4 AC Power Line Conducted Emissions

3.4.1 Specification Reference

FCC 47 CFR Part 15C, ISED RSS-210 and ISED RSS-GEN, Clause 15.207, N/A and 8.8

3.4.2 Equipment Under Test and Modification State

RM's Legic SM-6300, Serial Number: 04047503, Modification State: 0

3.4.3 Date of Test

2019-11-13

3.4.4 Test Method

See section 2.1 of this test report.

The test was performed with the 13.56 MHz attached and with the 13.56 MHz antenna substituted by a 50 Ohms resistor.

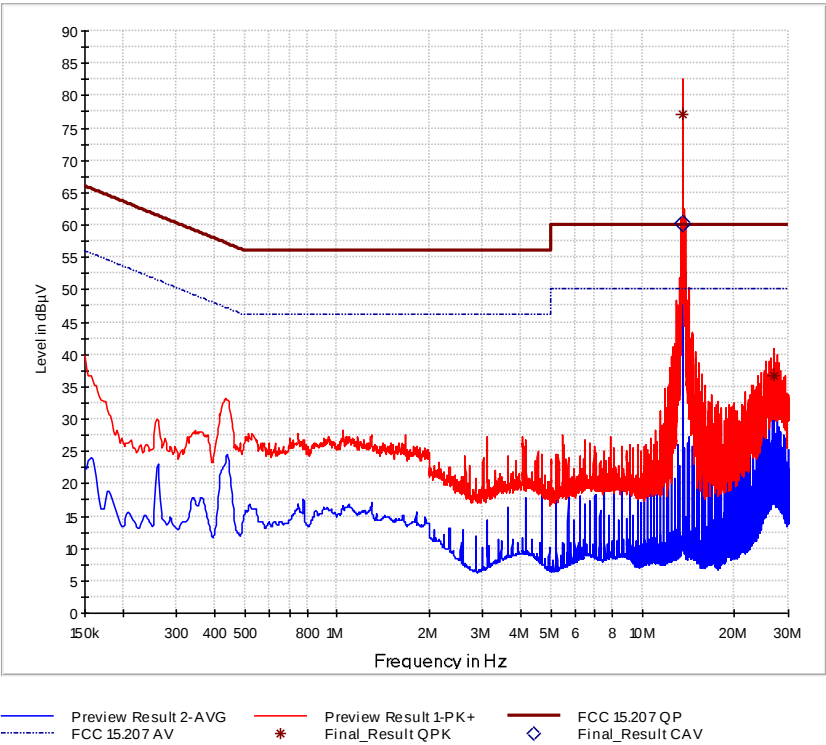
3.4.5 Environmental Conditions

Ambient Temperature	23.2 °C
Relative Humidity	48.5 %



3.4.6 Test Results

Life L Emissions Results with the Antenna

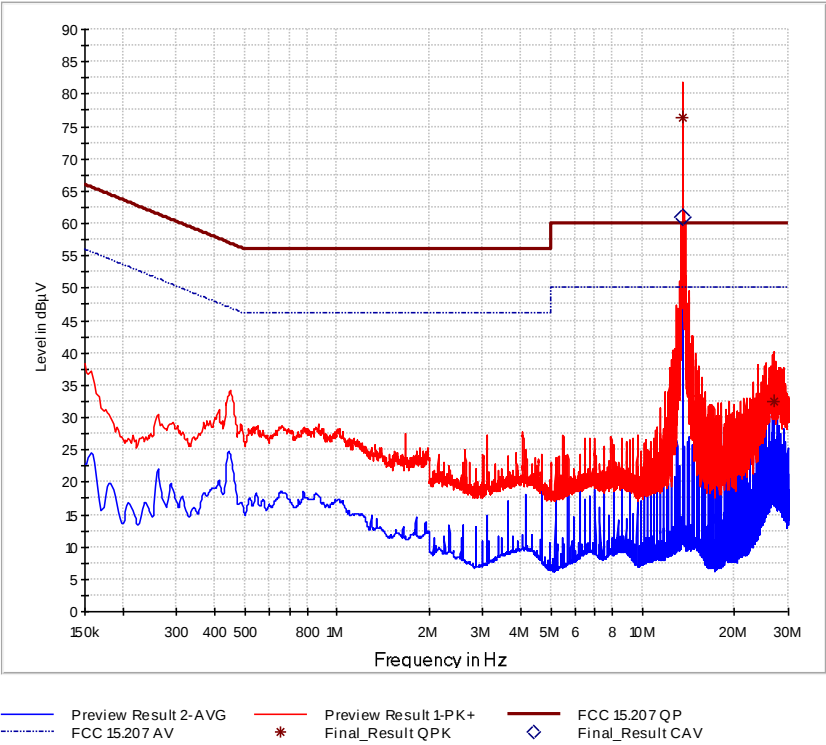


Final Results:

Frequency MHz	QuasiPeak dBµV	CAverage dBµV	Limit dBµV	Margin dB	Meas. Time ms	Bandwidth kHz	Line	Filter	Corr. dB
13.560000	---	60.24	50.00	-10.24	1000.0	9.000	L1	OFF	10.2
13.560000	77.01	---	60.00	-17.01	1000.0	9.000	L1	OFF	10.2
26.981250	36.65	---	60.00	23.35	1000.0	9.000	L1	OFF	10.4



Neutral N Emissions Results with the Antenna

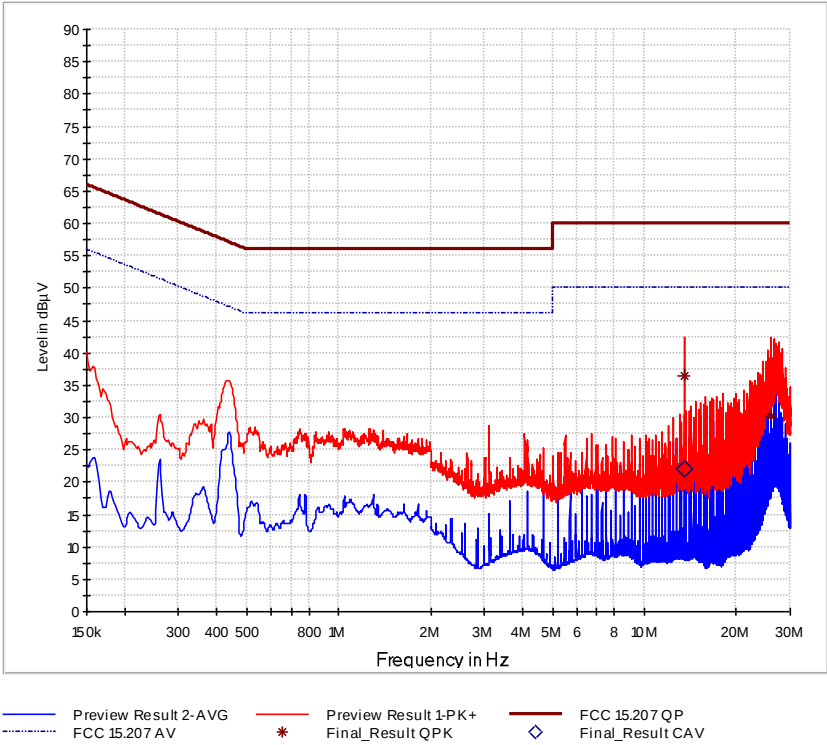


Final Results:

Frequency MHz	QuasiPeak dBµV	CAverage dBµV	Limit dBµV	Margin dB	Meas. Time ms	Bandwidth kHz	Line	Filter	Corr. dB
13.560000	---	61.09	50.00	-11.09	1000.0	9.000	N	OFF	10.2
13.560000	76.27	---	60.00	-16.27	1000.0	9.000	N	OFF	10.2
26.970000	32.57	---	60.00	27.43	1000.0	9.000	N	OFF	10.4



Life L Emissions Results without the Antenna

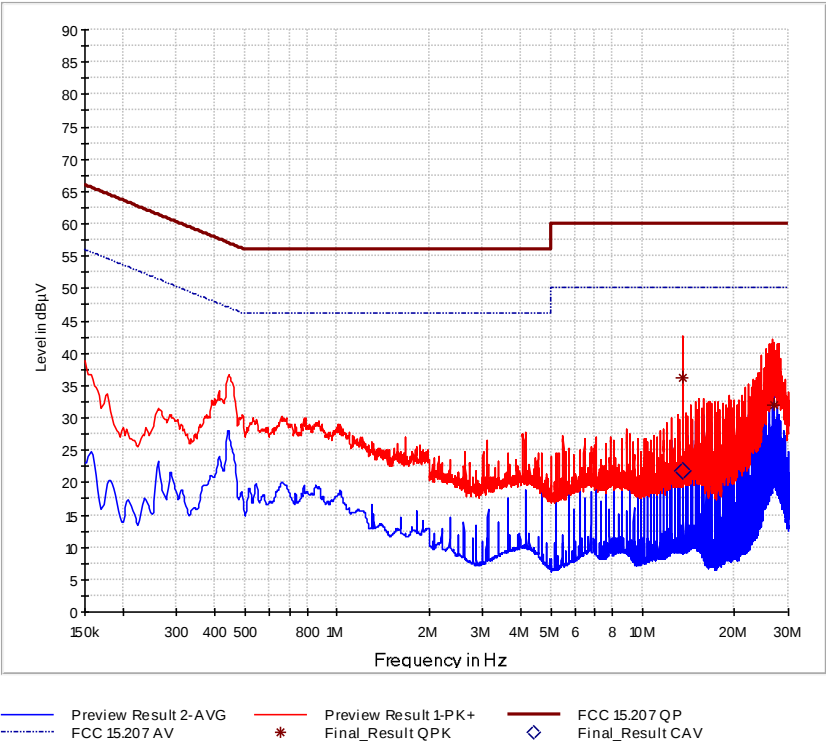


Final Results:

Frequency MHz	QuasiPeak dBµV	CAverage dBµV	Limit dBµV	Margin dB	Meas. Time ms	Bandwidth kHz	Line	Filter	Corr. dB
13.560000	---	21.95	50.00	28.05	1000.0	9.000	L1	OFF	10.2
13.560000	36.50	---	60.00	23.50	1000.0	9.000	L1	OFF	10.2
25.948500	30.29	---	60.00	29.71	1000.0	9.000	L1	OFF	10.4



Neutral N Emissions Results without the Antenna



Final Results:

Frequency MHz	QuasiPeak dBµV	CAverage dBµV	Limit dBµV	Margin dB	Meas. Time ms	Bandwidth kHz	Line	Filter	Corr. dB
13.560000	---	21.88	50.00	28.12	1000.0	9.000	N	OFF	10.2
13.560000	36.31	---	60.00	23.69	1000.0	9.000	N	OFF	10.2
27.024000	31.92	---	60.00	28.08	1000.0	9.000	N	OFF	10.4



FCC 47 CFR Part 15. Limit Clause 15.207 and ISSED RSS-GEN. Limit Clause 8.8

Frequency of Emission (MHz)	Conducted Limit (dBμV)	
	Quasi-Peak	Average
0.15 to 0.5	66 to 56*	56 to 46*
0.5 to 5	56	46
5 to 30	60	50

Table 20

*Decreases with the logarithm of the frequency.

3.4.7 Test Location and Test Equipment Used

This test was carried out in Shielded room - cabin no. 4.

Instrument	Manufacturer	Type No	TE No	Calibration Period (months)	Calibration Due
EMI test receiver	Rohde & Schwarz	ESCI3	19730	12	2020-11-30
V-network	Rohde & Schwarz	ENV216	39908	12	2020-02-02
Test Software	Rohde & Schwarz	EMC32 – v9.26.01	20090	NA	NA

Table 21

TU - Traceability Unscheduled

O/P Mon – Output Monitored using calibrated equipment

N/A - Not Applicable



3.5 Exposure of Humans to RF Fields

3.5.1 Specification Reference

ISED RSS-GEN Issue 5, section 3.3 and
ISED RSS-102, Issue 5, section 2.5
KDB 447498 D01 General RF Exposure Guidance v06, chapter 4.3.1

3.5.2 Guide

IC RSS-102 Issue 5, section 2.5

3.5.3 Equipment Under Test and Modification State

RMs Legic SM-6300, Serial Number: 04047503, Modification State: 0

3.5.4 Date of Test

2019-10-14

3.5.5 Test Results

Please refer to next pages



Exposure of Humans to RF Fields	Applicable	Declared by applicant	Measured	Exemption				
The antenna is								
☐ detachable								
The conducted output power (CP in watts) is measured at the antenna connector: $CP = \dots\dots\dots \text{ W}$ The effective isotropic radiated power (EIRP in watts) is calculated using ☐ the numerical antenna gain: $G = \dots\dots\dots$ $EIRP = G \cdot CP \Rightarrow EIRP = \dots\dots\dots \text{ W}$ ☐ the field strength¹ in V/m: $FS = \dots\dots\dots \text{ V/m}$ $EIRP = \frac{(FS \cdot D)^2}{30} \Rightarrow EIRP = \dots\dots\dots \text{ W}$ with: Distance between the antennas in m: $D = \dots\dots\dots \text{ m}$			☐					
☒ not detachable								
A field strength measurement is used to determine the effective isotropic radiated power (EIRP in watts) given by: $EIRP = \frac{(FS \cdot D)^2}{30} \Rightarrow EIRP = 0.026 \text{ mW}$ with: Field strength in V/m: $FS = 0.00156$ Distance between the two antennas in m: $D = 3$							☒	☒
Selection of output power								
The output power TP is the higher of the conducted or effective isotropic radiated power (e.i.r.p.): $TP = 0.733 \text{ } \mu\text{W}$								

¹ The conversion formula is valid only for properly matched antennas. In other cases the transmitter output power may have to be measured by a terminated measurement when applying the exemption clauses. If an open area test site is used for field strength measurement, the effect due to the metal ground reflecting plane should be subtracted from the maximum field strength value in order to reference it to free space, before calculating TP.



Exposure of Humans to RF Fields (continued)		Applicable	Declared by applicant	Measured	Exemption
Separation distance between the user and the transmitting device is					
☒ less than or equal to 20 cm	☐ greater than 20 cm		☐		
Transmitting device is					
☐ in the vicinity of the human head	☐ body-worn		☐		



SAR evaluation										
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 (adjusted for tune-up tolerance) for the specified separation distance defined in the table. For controlled use devices where the 8 W/kg for 1 gram of tissue applies, the exemption limits for routine evaluation in the table are multiplied by a factor of 5. For limb-worn devices where the 10 gram value applies, the exemption limits for routine evaluation in the table are multiplied by a factor of 2.5. If the operating frequency of the device is between two frequencies located in the table, linear interpolation shall be applied for the applicable separation distance. For test separation distance less than 5 mm, the exemption limits for a separation distance of 5 mm can be applied to determine if a routine evaluation is required. For medical implants devices, the exemption limit for routine evaluation is set at 1 mW. The output power of a medical implants device is defined as the higher of the conducted or e.i.r.p to determine whether the device is exempt from the SAR evaluation.										
Frequency (MHz)	Exemption limits (mW) ² at separation distance of									
	≤5 mm	10 mm	15 mm	20 mm	25 mm	30 mm	35 mm	40 mm	45 mm	≥50 mm
≤300 ³	71	101	132	162	193	223	254	284	315	345
450	52	70	88	106	123	141	159	177	195	213
835	17	30	42	55	67	80	92	105	117	130
1900	7	10	18	34	60	99	153	225	316	431
2450	4	7	15	30	52	83	123	173	235	309
3500	2	6	16	32	55	86	124	170	225	290
5800	1	6	15	27	41	56	71	85	97	106

² The exemption limit in the table are based on measurements and simulations on half-wave dipole antennas at separation distances of 5 mm to 25 mm from a flat phantom, providing a SAR value of approximately 0.4 W/kg for 1 g of tissue. For low frequencies (300 MHz to 835 MHz), the exemption limits are derived from a linear fit. For high frequencies (1900 MHz and above), the exemption limits are derived from a third order polynomial fit.

³ Transmitters operating between 3 kHz and 10 MHz, meeting the exemption from routine SAR evaluation, shall demonstrate compliance to the instantaneous limits in IC RSS-102, issue 5, section 4.



Carrier frequency:	f	=	13.56 MHz				
Distance:	d	=	5 mm				
Transmitter output power:	TP	=	0.000733 mW				
Limit:	TP_{limit}	=	71 mW				☒
☐ SAR evaluation is documented in test report no. ...							

KDB 447498 D01:

Frequency: 13.56 MHz
Test separation distance: 5 mm

Calculation acc. to KDB 447498 4.3.1.c); frequencies below 100 MHz and for test separation distances ≤ 50 mm the power threshold is determined for 50 mm and 100 MHz multiplied by $\frac{1}{2}$:

Threshold: $\frac{1}{2} \cdot (1 + 0) \cdot \left(\frac{1mW}{50\ mm} \cdot \sqrt{0.1GHz} \right) = 0.003 \approx 0.0$

The 1 g and 10 g SAR test exclusion limits are 3.0 and 7.5.

4 Measurement Uncertainty

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

Radio Testing			
Test Name	kp	Expanded Uncertainty	Note
Occupied Bandwidth	2.0	$\pm 1.14 \%$	2
RF-Frequency error	1.96	$\pm 1 \cdot 10^{-7}$	7
RF-Power, conducted carrier	2	$\pm 0.079 \text{ dB}$	2
RF-Power uncertainty for given BER	1.96	$+0.94 \text{ dB} / -1.05$	7
RF power, conducted, spurious emissions	1.96	$+1.4 \text{ dB} / -1.6 \text{ dB}$	7
RF power, radiated			
25 MHz – 4 GHz	1.96	$+3.6 \text{ dB} / -5.2 \text{ dB}$	8
1 GHz – 18 GHz	1.96	$+3.8 \text{ dB} / -5.6 \text{ dB}$	8
18 GHz – 26.5 GHz	1.96	$+3.4 \text{ dB} / -4.5 \text{ dB}$	8
40 GHz – 170 GHz	1.96	$+4.2 \text{ dB} / -7.1 \text{ dB}$	8
Spectral Power Density, conducted	2.0	$\pm 0.53 \text{ dB}$	2
Maximum frequency deviation			
300 Hz – 6 kHz	2	$\pm 2.89 \%$	2
6 kHz – 25 kHz	2	$\pm 0.2 \text{ dB}$	2
Maximum frequency deviation for FM	2	$\pm 2.89 \%$	2
Adjacent channel power 25 MHz – 1 GHz	2	$\pm 2.31 \%$	2
Temperature	2	$\pm 0.39 \text{ K}$	4
(Relative) Humidity	2	$\pm 2.28 \%$	2
DC- and low frequency AC voltage			
DC voltage	2	$\pm 0.01 \%$	2
AC voltage up to 1 kHz	2	$\pm 1.2 \%$	2
Time	2	$\pm 0.6 \%$	2

Table 22



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

Table 23



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

Table 24

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 $p = 95.45\%$