

Report on the FCC and IC Testing of the Dormakaba Deutschland GmbH

Model: Legic on Module (LoM)

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

Prepared for: Dormakaba Deutschland GmbH
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FCC ID: NVI-LOM63S
IC: 11038A-LOM63S



Product Service

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Date: 2026-03-23

Document Number: TR-713351460-01 | Revision 2

RESPONSIBLE FOR	NAME	DATE	SIGNATURE
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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 C and ISED RSS-210 and RSS-GEN.

The sample tested was found to comply with the requirements defined in the applied rules.

RESPONSIBLE FOR	NAME	DATE	SIGNATURE
Testing	Alexander Deese	2026-03-23	 SIGN-ID 1116922

Laboratory Accreditation
DAkkS Reg. No. D-PL-11321-11-03
DAkkS Reg. No. D-PL-11321-11-04

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

Industry Canada test site registration
3050A-2

Executive Statement:

A sample of this product was tested and found to be compliant with FCC 47 CFR Part 15 C:2023 and ISED RSS210:2024 and ISED RSSGen:2019

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1 Report Summary

1.1 Modification Report

Alternations and additions to this report will be issued to the holders of each copy in the form of a complete document. The current version replaces all previous versions.

<i>Revision</i>	<i>Description of changes</i>	<i>Date of Issue</i>
0	First Issue	2025-02-25
1	Hardware and Software Version added.	2025-12-09
2	ANSI C63.10 updated to 2020 version.	2026-03-23

Table 1: Report of Modifications

1.2 Introduction

Applicant	Dormakaba Deutschland GmbH
Manufacturer	Dormakaba Deutschland GmbH
Model Number(s)	Legic on Module (LoM)
Serial Number(s)	---
Hardware Version(s)	Assembly:V00, SM-6310: V1.5
Software Version(s)	SM-6310: V1.8.2 / V3.x / V4.x
Number of Samples Tested	1
Test Specification(s) /	FCC 47 CFR Part 15 C : 2023 and
Issue / Date	ISED RSS-210, Issue 11, 2024
	ISED RSS-Gen, Issue 5, Amd. 1 : 2019, Amd. 2 : 2021
Order Number	8082964
Date	2024-10-29
Date of Receipt of EUT	2024-10-14
Start of Test	2024-11-15
Finish of Test	2024-12-05
Name of Engineer(s)	Alexander Deese, Michael Ingerl
Related Document(s)	ANSI C63.10:2020



1.3 Brief Summary of Results

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

Section	Specification Clause	Test Description	Result
---	15.203	Antenna requirement	N/T
2.1	15.215(c)	Bandwidth of Signal	Pass
---	15.207	Conducted Disturbance at Mains Terminal	N/T
2.2	15.209, 15.225	Radiated Disturbance	Pass
2.3	15.225(e)	Frequency Tolerance	Pass

Table 2: Results according to FCC 47 CFR Part 15 C

Section	Specification Clause	Test Description	Result
2.2	7.3	Radiated Emissions	Pass
---	7.3	AC Power Line Conducted Emissions	N/T
2.3	B.6 b.	Frequency Tolerance	Pass

Table 3: Results according to ISED RSS-210

Section	Specification Clause	Test Description	Result
2.1	6.7	Bandwidth of Signal	Pass
---	8.8	AC Power Line Conducted Emissions	N/T
2.2	8.9, 8.10	Radiated Emissions	Pass
2.3	6.11	Frequency Tolerance	Pass

Table 4: Results according to ISED RSS-Gen

N/T = not tested



1.4 Product Information

1.4.1 Technical Description

The EUT is a radio module with RFID and Bluetooth:

Frequency Band: 11.810 MHz – 15.310 MHz

Supply Voltage: 5 V

Supply Frequency: DC

*Highest clock frequency
(non-radio part):* ---

Antenna Gain: 0.0 dBi

1.5 Test Configuration

The EUT was 5V / DC power supplied. The radio module was transmitting continuously. Radio frequency and power was configured via test software provided by the customer.

1.6 Modes of Operation

Continuously transmitting.

1.7 Deviations from Standard



1.8 EUT Modifications Record

The table below details modifications made to the EUT during the test program.
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
0	As supplied by the customer	Not Applicable	Not Applicable

Table 5

1.9 Test Location

TÜV SÜD Product Service conducted the following tests at our Straubing test laboratory:

Test Name	Name of Engineer(s)
Configuration according to 1.5 and 1.6	
Bandwidth of Signal	Alexander Deese
Conducted Disturbance at Mains Terminal	Alexander Deese
Radiated Disturbance	Alexander Deese
Frequency Tolerance	Alexander Deese

Office Address:

Äußere Frühlingstraße 45
94315 Straubing
Germany



2 Test Details

2.1 Bandwidth of Signal

2.1.1 Specification Reference

FCC 47 CFR Part 15 C, Clause 15.215(c)
ISED RSS-Gen, Clause 6.7

2.1.2 Equipment under Test and Modification State

Legic on Module (LoM); S/N ---; Modification state 0

2.1.3 Date of Test

2024-11-18

2.1.4 Environmental Conditions

Ambient Temperature	20 °C
Relative Humidity	40 %

2.1.5 Specification Limits

No limitation – Bandwidth noted

2.1.6 Test Method

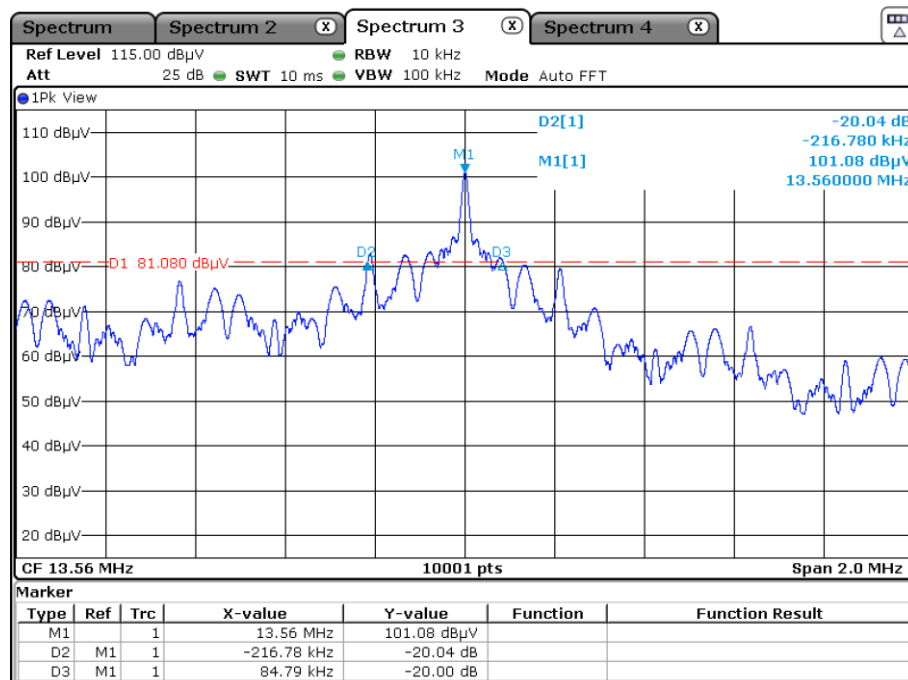
The test was performed according to ANSI C63.10, clauses 6.9
See section 2.2 of this test report for details.



2.1.7 Test Results

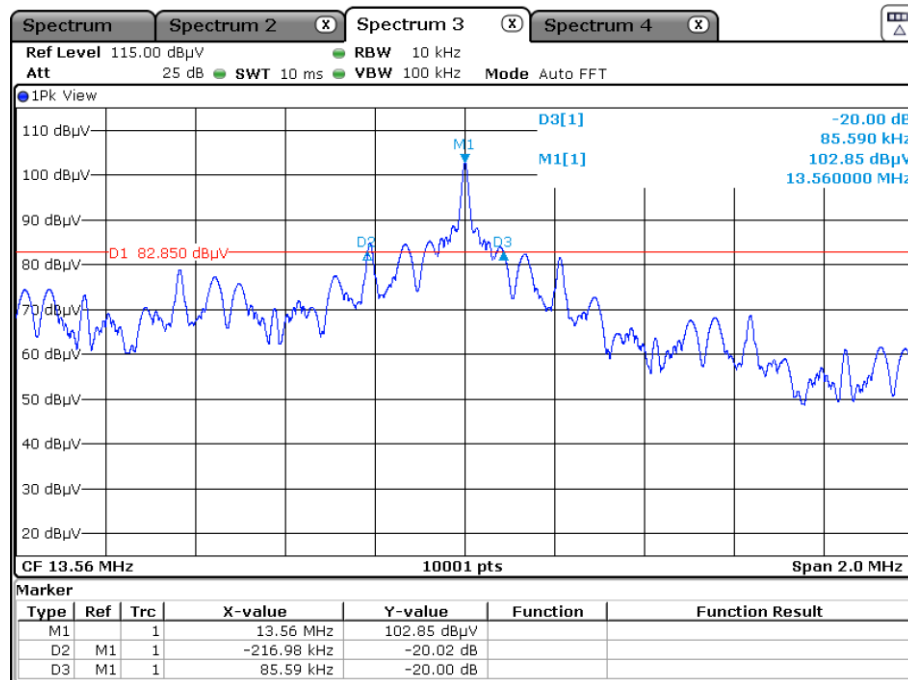
Voltage	Center frequency	20 dB Bandwidth (MHz)
4.5 V	13.56 MHz	0.3016
5.5 V	13.56 MHz	0.3026

Table 6: 20 dB bandwidth



Date: 18.NOV.2024 09:22:03

Figure 1 – 20 dB Bandwidth, 4.5 V



Date: 18.NOV.2024 09:24:16

Figure 2 – 20 dB Bandwidth, 5.5 V



<i>Voltage</i>	<i>Centre Frequency</i>	<i>99% Bandwidth (MHz)</i>
4.5 V	13.5600405 MHz	0.004214182344
5.5 V	13.5600304 MHz	0.004477568741

Table 7: 99% bandwidth

2.1.8 Test Location and Test Equipment

The test was carried out in a non-shielded room:

Instrument	Manufacturer	Type No	TE No	Calibra- tion Pe- riod (months)	Calibration Due
Signal and Spectrum Analyzer	Rohde & Schwarz	FSV40	20219	24	2026-03-31
Climatic test chamber	ESPEC	PL-4J	38958	18	2025-01-31

Table 8



2.2 Radiated Emissions

2.2.1 Specification Reference

FCC 47 CFR Part 15 C, Clauses 15.205, 15.209 and 15.225
ISED RSS-210, Clause 7.7 and B.6
ISED RSS-Gen, Clauses 8.9 and 8.10

2.2.2 Equipment under Test and Modification State

Legic on Module (LoM); S/N ---; Modification state 0

2.2.3 Date of Test

2024-11-15 to 2024-12-05

2.2.4 Environmental Conditions

Ambient Temperature	20 °C
Relative Humidity	40 %



2.2.5 Specification Limits

Radiated emission limits:					
Frequency Range (MHz)	Test distance (m)	Field strength		Field strength	
		($\mu\text{A/m}$)	($\text{dB}\mu\text{A/m}$)	($\mu\text{V/m}$)	($\text{dB}\mu\text{V/m}$)
0.009 – 0.49	300	$6.37 / f$	$20*\lg(6.37 / f)$	$2400 / f$	$20*\lg(2400 / f)$
0.49 – 1.705	30	$63.7 / f$	$20*\lg(63.7 / f)$	$24000 / f$	$20*\lg(24000 / f)$
1.705 – 13.110	30	0.08	-21.94	30	29.54
13.110 – 13.410	30	0.283	-11.0	106	40.5
13.410 – 13.553	30	0.891	-1.0	334	50.5
13.553 – 13.567	30	42.26	32.5	15848	84
13.567 – 13.710	30	0.891	-1.0	334	50.5
13.710 – 14.010	30	0.283	-11.0	106	40.5
14.010 - 30	30	0.08	-21.94	30	29.54
30 – 88	3	---	---	100	40
88 – 216	3	--	---	150	43.5
126 – 960	3	--	---	200	46
above 960	3	--	---	500	54
Note 1: f in kHz					

Table 9 Radiated emission limits

At frequencies at or above 30 MHz, measurements may be performed at distance other than what is specified provided: measurements are not made in the near field except where it can be shown that near field measurements are appropriate due to the characteristics of the device; and it can be demonstrated that the signal levels needed to be measured at the distance employed can be detected by the measurement equipment. Measurements shall not be performed at a distance greater than 30 m, unless it can be further demonstrated that measurements at a distance of 30 m or less are impractical. When performing measurements at a distance other than that specified, the results shall be extrapolated to the specified distance using an extrapolation factor of 20 dB/decade (inverse linear-distance for field strength measurements; inverse-linear-distance-squared for power density measurements).

At frequencies below 30 MHz, measurements may be performed at a distance closer than that specified in the regulations; however, an attempts should be made to avoid making measurements in the near field. Pending the development of an appropriate measurement procedure for measurements performed below 30 MHz, when performing measurements at a closer distance than specified, the results shall be extrapolated to the specified distance by either making measurements at a minimum of two distances on at least one radial to determine the proper extrapolation factor or by using the square of an inverse linear distance extrapolation factor (40 dB/decade).

2.2.6 Test Method

The test was performed according to ANSI C63.10, sections 11.11 and 11.12

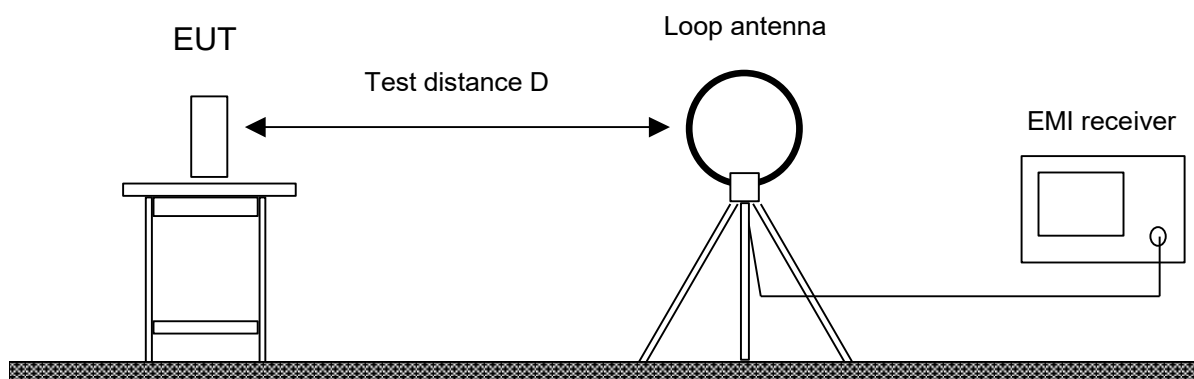
Prescans are performed in six positions of the EUT to get the full spectrum of emission caused by the EUT with the measuring antenna raised and lowered from 1 m to 4 m with vertical and horizontal polarisation to find the combination of table position, antenna height and antenna polarisation for the maximum emission levels.

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

Further maximisation for adjusting the maximum position is following.

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

2.2.6.1 Frequency range 9 kHz – 30 MHz

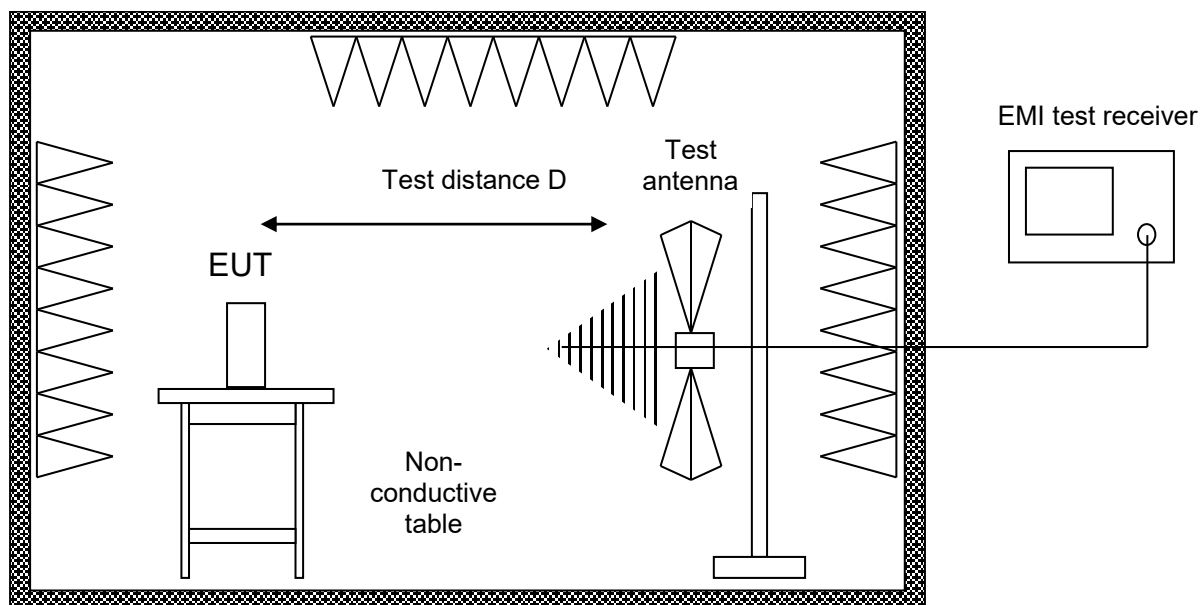


The EUT was placed on a non-conductive table, 0.8 m above the ground.

Radiated emissions in the frequency 9 kHz – 30 MHz is measured within a semi-anechoic room with an active loop antenna with the measurement detector set to peak. In addition in the frequency range 9 kHz to 490 kHz also an average detector was used. The measurement bandwidth of the receiver was set to 300 Hz in the frequency range 9 kHz to 150 kHz and 10 kHz in the frequency range 150 kHz to 30 MHz. Prescans were performed in six positions of the EUT.

For final measurements the detector was set to CISPR quasi-peak and in addition to CISPR average in the frequency range 9 kHz to 490 kHz with a resolution bandwidth 200 Hz in the frequency range 9 kHz to 150 kHz and 9 kHz in the frequency range 150 kHz to 30 MHz. Final tests were performed immediately after a final frequency and zoom (for drifting disturbances) and maximum adjustment.

2.2.6.2 Frequency range 30 MHz – 1 GHz



Alternate test site (semi anechoic room)

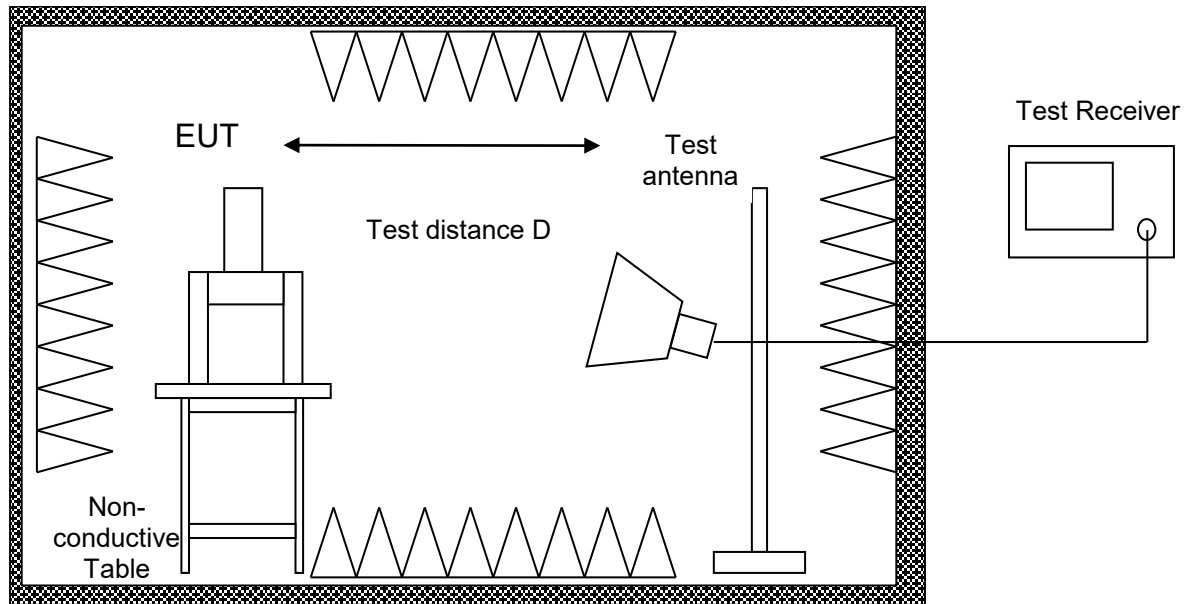
The EUT was placed on a non-conductive table, 0.8 m above the ground plane

Radiated emissions in the frequency range 30 MHz – 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 polarised logarithmic periodic antenna combined with a 4:1 broadband dipole ("Trilog broadband antenna") is used.

For prescan tests the test receiver is set to peak-detector with a bandwidth of 120 kHz.

With the measurement bandwidth of the test receiver set to 120 kHz CISPR quasi-peak detector is selected for final measurements following immediately after a final frequency zoom (for drifting disturbances) and maximum adjustment.

2.2.6.3 Frequency range above 1 GHz



Fully anechoic room

The EUT was placed on a non-conductive table, 1.5 m above the ground plane

Radiated emission tests above 1 GHz are performed in a fully anechoic room with the S_{VSWR} requirements of ANSI C63.4. Measurements are performed both in the horizontal and vertical planes of polarisation using a test receiver with the detector function set to peak and average and the resolution bandwidth set to 1 MHz. Testing above 1 GHz is performed with horn antennas with the EUT in boresight of the antenna.

For prescan tests the test receiver is set to peak- and average-detector with a bandwidth of 1 MHz.

With the measurement bandwidth of the test receiver set to 1 MHz and peak- and CISPR average-detector is selected for final measurements following immediately after a final frequency zoom (for drifting disturbances) and maximum adjustment.



2.2.7 Test Results

<i>Frequency range</i>	<i>Limit applied</i>	<i>Test distance</i>
9 kHz – 30 MHz	§ 15.209 & § 15.225	3 m
30 MHz – 1 GHz	§ 15.209	3 m

Table 10

Sample calculation:

$$\text{Final Value (dB}\mu\text{V/m)} = \text{Reading Value (dB}\mu\text{V)} + (\text{Cable attenuation (dB)} \\ + \text{Antenna Transducer (dB(1/m))})$$

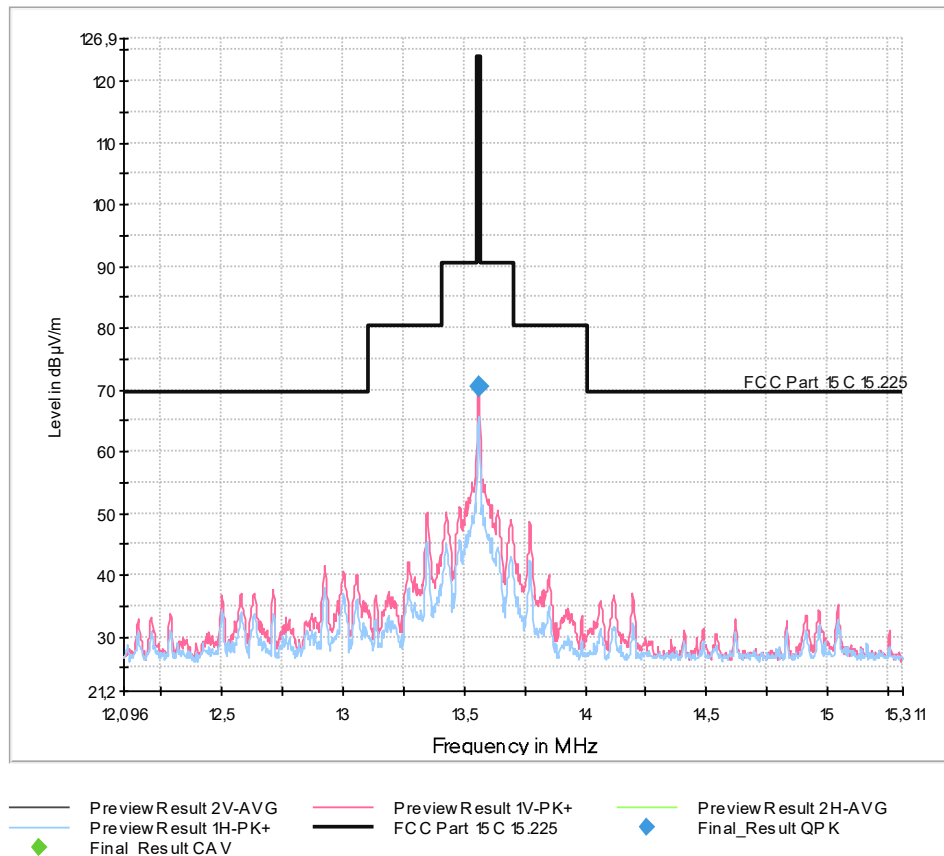
Additional correction of limit in the frequency range 9 – 490 kHz (300 m to 3 m): +80.0 dB

Additional correction of limit in the frequency range 490 kHz – 30 MHz (30 m to 3 m): +40.0 dB

Additional correction of limit in the frequency ranges above 1 GHz (3 m to 1 m): +9.54 dB



Frequency range 13.01 MHz – 14.11 MHz (Spectrum Mask acc. 15.225(a)-(c)):

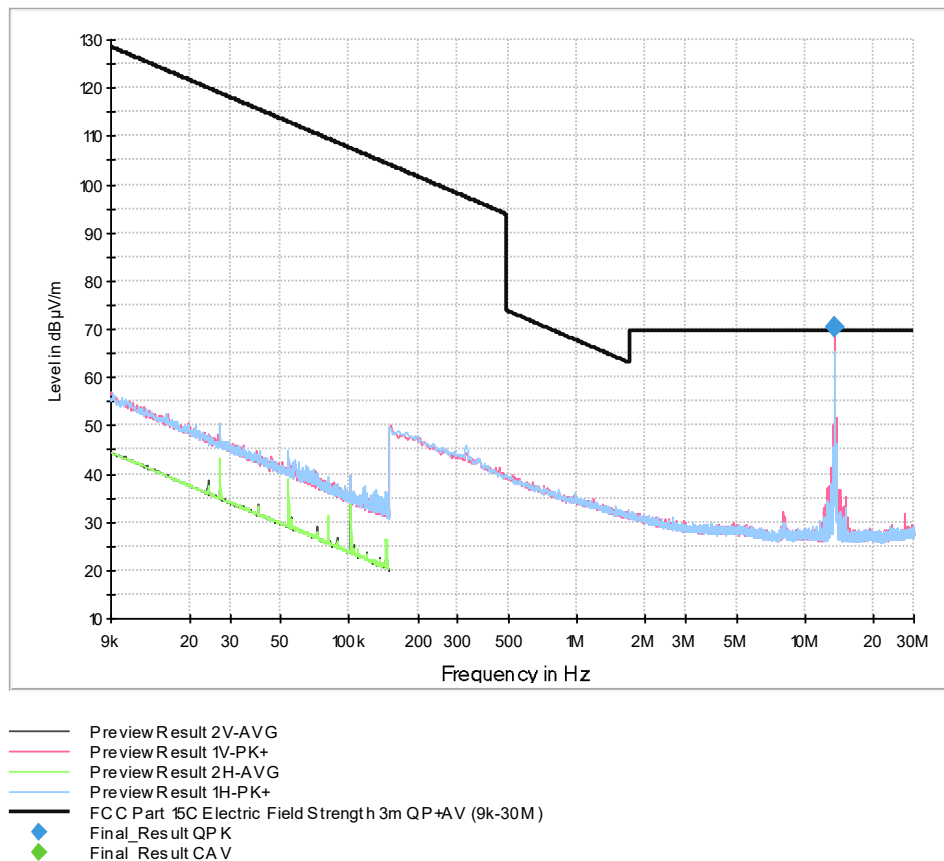


Final Results:

Frequency MHz	QuasiPeak dBµV/m	Limit dBµV/m	Margin dB	Meas. Time ms	Band- width kHz	Height cm	Pol	Azi- muth deg	Corr. dB/m
13.560000	70.39	124.00	53.61	1000.0	9.000	100.0	V	-107.0	19.2



Frequency range 9 kHz – 30 MHz:



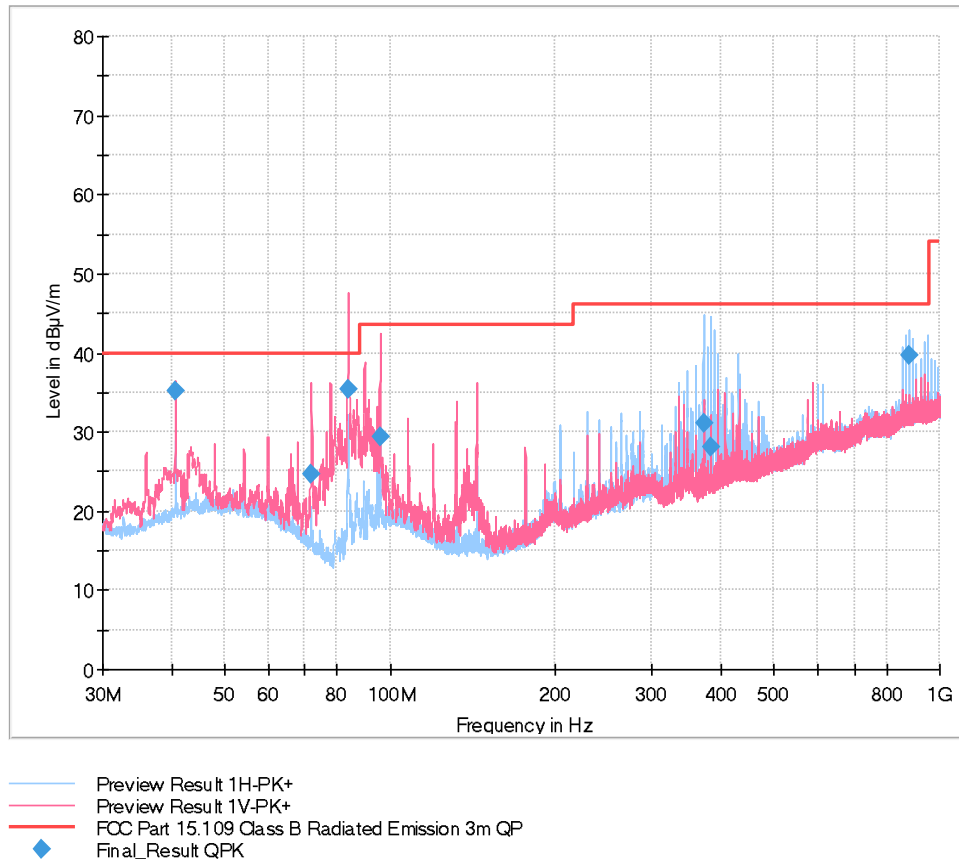
Final Results:

Frequency MHz	QuasiPeak at 3m dBµV/m	Limit dBµV/m	Margin dB	Meas. Time ms	Band- width kHz	Height cm	Pol	Azi- muth deg	Corr. dB/m
13.560000	70.39	---	---	1000.0	9.000	100.0	V	-107.0	19.2

Frequency MHz	QuasiPeak at 30m dBµV/m	Limit dBµV/m	Margin dB	Meas. Time ms	Band- width kHz	Height cm	Pol	Azimuth deg
13.560000	43.10	84.00	40.90	1000.0	9.000	100.0	V	-107.0



Frequency range 30 MHz – 1 GHz:



Final Results:

Frequency MHz	QuasiPeak dBμV/m	Limit dBμV/m	Margin dB	Meas. Time ms	Band- width kHz	Height cm	Pol	Azi- muth deg	Corr. dB/m
40.680000	35.19	40.00	4.81	1000.0	120.000	100.0	V	92.0	20.7
71.880000	24.57	40.00	15.43	1000.0	120.000	150.0	V	-135.0	17.1
83.910000	35.31	40.00	4.69	1000.0	120.000	110.0	V	52.0	15.8
95.910000	29.33	43.52	14.19	1000.0	120.000	125.0	V	72.0	19.6
371.730000	31.09	46.02	14.93	1000.0	120.000	106.0	H	-174.0	23.6
383.670000	28.15	46.02	17.87	1000.0	120.000	110.0	H	-140.0	24.0
881.400000	39.62	46.02	6.40	1000.0	120.000	106.0	H	-174.0	31.8



2.2.8 Test Location and Test Equipment

The test was carried out in a semi anechoic room no. 3:

<i>Instrument</i>	<i>Manufacturer</i>	<i>Type No</i>	<i>TE No</i>	<i>Calibra- tion Pe- riod (months)</i>	<i>Calibration Due</i>
TRILOG Broadband Antenna	Schwarzbeck	VULB 9163	19691	36	2027-04-30
Loop antenna	Schwarzbeck	FMZB 1519 B	44334	36	2026-06-30
EMI test receiver	Rohde & Schwarz	ESR7	61814	12	2025-06-30
Semi anechoic room	Frankonia	Cabin no. 3	56331	35	2025-07-07
EMC measurement software	Rohde & Schwarz	EMC32 TS8997 – V10.60.00	44381	---	---

Table 11



2.3 Temperature Stability

2.3.1 Specification Reference

FCC 47 CFR Part 15 E, Clause 15.225(e)
ISSED RSS-210, Clause B.6 b.
ISED RSS-Gen, Clause 6.11

2.3.2 Equipment under Test and Modification State

Legic on Module (LoM); S/N ---; Modification state 0

2.3.3 Date of Test

2024-11-18

2.3.4 Environmental Conditions

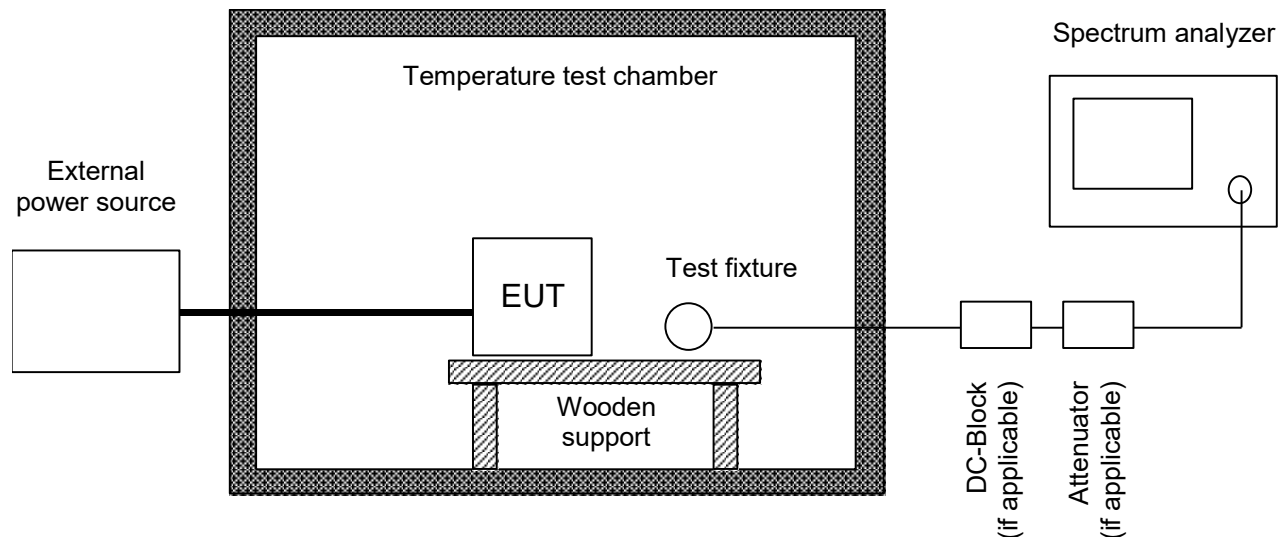
Ambient Temperature	20 °C
Relative Humidity	40 %

2.3.5 Specification Limits

The frequency tolerance of the carrier signal shall be maintained within ± 0.01 % of the operating frequency over a temperature variation of -20 °C to $+50$ °C at normal supply voltage, and for a variation in the primary supply voltage from 85 % to 115 % of the rated supply voltage at a temperature of 20 °C. For battery operated equipment, the equipment tests shall be performed using a new battery.

2.3.6 Test Method

The test was performed according to ANSI C63.10, section 6.8.



The frequency tolerance of the carrier signal is measured over a temperature variation of -20°C to $+50^{\circ}\text{C}$ at normal supply voltage, and for a variation in the primary supply voltage from 85 % to 115 % of the rated supply voltage at a temperature of 20°C . Temperature and voltage range may vary if the manufacturer states another temperature or voltage range.

If the EUT provides an antenna connector the spectrum analyzer is connected to this port. If required, a resistive matching network equal to the impedance specified or employed for the antenna is used as well as a DC block and appropriate (50 Ω) attenuators. In case where the EUT does not provide an antenna connector or a test fixture is used.

For battery operated equipment, the test is performed using a new battery. Alternatively, an external supply voltage can be used and is at least set to:

- The maximum battery voltage as delivered by a new battery or 115 % of the battery nominal voltage;
- The battery nominal voltage
- 85 % of the battery nominal voltage
- The battery operating end point voltage which shall be specified by the equipment manufacturer.

The EUT is operating providing an unmodulated carrier for frequency error tests. The peak detector of the spectrum analyzer is selected and resolution as well as video bandwidth are set to values appropriate to shape of the spectrum of the EUT. The frequency counter mode of the spectrum analyzer is used to maximize the accuracy of the measured frequency tolerance.

If an unmodulated carrier is not available a significant and stable point of the spectrum is selected and the span is reduced to a value that delivers an accuracy which shall be better than 1 % of the maximum frequency tolerance allowed for the carrier signal. This method may be performed as long as the margin to the frequency tolerance is larger than the uncertainty of the measured frequency tolerance.



Product Service

2.3.7 Test Results

<i>Temperature</i>	<i>Supply Voltage</i>	<i>Frequency drift (Hz)</i>	<i>Relative drift (%)</i>
20 °C	5.0 V	40.5	0.00030
20 °C	4.5 V	40.5	0.00030
20 °C	5.5 V	30.4	0.00022
-30 °C	4.5 V	40.5	0.00030
-30 °C	5.5 V	70.9	0.00052
85 °C	4.5 V	0.00	0.00000
85 °C	5.5 V	30.4	0.00022

Table 12



2.3.8 Test Location and Test Equipment

The test was carried out in a non-shielded room:

Instrument	Manufacturer	Type No	TE No	Calibration Period (months)	Calibration Due
Signal and Spectrum Analyzer	Rohde & Schwarz	FSV40	20219	24	2026-03-31
Climatic test chamber	ESPEC	PL-4J	38958	18	2025-01-31

Table 13



3 Measurement Uncertainty

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

<i>Radio Interference Emission Testing</i>		
<i>Test Name</i>	<i>kp</i>	<i>Expanded Uncertainty</i>
Conducted Voltage Emission		
9 kHz to 150 kHz (50Ω/50μH AMN)	2	± 3.8 dB
150 kHz to 30 MHz (50Ω/50μH AMN)	2	± 3.4 dB
100 kHz to 200 MHz (50Ω/5μH AMN)	2	± 3.6 dB
Discontinuous Conducted Emission		
9 kHz to 150 kHz (50Ω/50μH AMN)	2	± 3.8 dB
150 kHz to 30 MHz (50Ω/50μH AMN)	2	± 3.4 dB
Conducted Current Emission		
9 kHz to 200 MHz	2	± 3.5 dB
Magnetic Fieldstrength		
9 kHz to 30 MHz (with loop antenna)	2	± 3.9 dB
9 kHz to 30 MHz (large-loop antenna 2 m)	2	± 3.5 dB
Radiated Emission		
30 MHz to 300 MHz	2	± 4.9 dB
300 MHz to 1 GHz	2	± 5.0 dB
1 GHz to 6 GHz	2	± 4.6 dB
Test distance 10 m		
30 MHz to 300 MHz	2	± 4.9 dB
300 MHz to 1 GHz	2	± 4.9 dB
The expanded uncertainty reported according to CISPR16-4-2: 2011 + A1 + A2 + Cor1 is based on a standard uncertainty multiplied by a coverage factor of $k_p = 2$, providing a level of confidence of $p = 95.45\%$		

Table 14 Measurement uncertainty based on CISPR 16-4-2



<i>Radio Interference Emission Testing</i>		
<i>Test Name</i>	<i>kp</i>	<i>Expanded Uncertainty</i>
Occupied Bandwidth	2	± 5 %
Conducted Power		
9 kHz ≤ f < 30 MHz	2	± 1.0 dB
30 MHz ≤ f < 1 GHz	2	± 1.5 dB
1 GHz ≤ f ≤ 40 GHz	2	± 2.5 dB
1 MS/s power sensor (TS8997)	2	± 1.5 dB
Occupied Bandwidth	2	± 5 %
Power Spectral Density	2	± 3.0 dB
Radiated Power		
25 MHz – 6 GHz	1.96	±4.4 dB
1 GHz – 18 GHz	1.96	±4.7 dB
18 GHz – 40 GHz	1.96	±4.9 dB
40 GHz – 325 GHz	1.96	±6.1 dB
Conducted Spurious Emissions	2	± 3.0 dB
Radiated Spurious Emissions	2	± 6.0 dB
Voltage		
DC	2	± 1.0 %
AC	2	± 2.0 %
Time (automatic)	2	± 5 %
Frequency	2	± 10 ⁻⁷
The expanded uncertainty reported according to ETSI TR 100 028:2001 is based on a standard uncertainty multiplied by a coverage factor of kp = 2, providing a level of confidence of p = 95.45%		

Table 15 Measurement uncertainty based on ETSI TR 100 028

The measurement uncertainty in the laboratory is less than or equal to the maximum measurement uncertainty according to CISPR16-4-2: 2011 + A1 + A2 + Cor1 (U_{CISPR}) and as specified in the test report below. This normative regulation means that the measured value is also the value to be assessed in relation to the limit value.



Test Name	Expanded Uncertainty
Occupied Bandwidth	±5 %
Conducted Power	
9 kHz ≤ f < 30 MHz	±1.0 dB
30 MHz ≤ f < 1 GHz	±1.5 dB
1 GHz ≤ f ≤ 40 GHz	±2.5 dB
1 MS/s power sensor (2.4 / 5 GHz band)	±1.5 dB
Power Spectral Density	±3.0 dB
Radiated Power	
25 MHz – 26.5 GHz	±6.0 dB
26.5 GHz – 66 GHz	±8.0 dB
40 GHz – 325 GHz	±10.0 dB
Conducted Spurious Emissions	±3.0 dB
Radiated Field Strength 9 kHz – 40 GHz	±6.0 dB
Voltage	
DC	± 1.0 %
AC	± 2.0 %
Time (automatic)	± 5 %
Frequency	± 10 ⁻⁷

Table 16 Decision Rule: Maximum allowed measurement uncertainty

END OF TEST REPORT