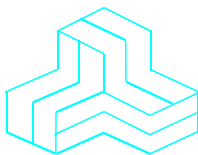


ENGINEERING TEST REPORT



Exciter
Model No.: EX21L
FCC ID: PQG-EX21L

Applicant:

Lyngsoe Systems Ltd.
5570 Kennedy Road, Unit B
Mississauga, Ontario
Canada, L4Z 2A9

In Accordance With

FEDERAL COMMUNICATIONS COMMISSION (FCC)
Part 15, Subpart C, Sections 15.209 & 15.231(e)
Low Power Transmitter & Momentarily Operation (125 kHz & 433.92 MHz)

UltraTech's File No.: LYT-018F15C231

This Test report is Issued under the Authority of
Tri M. Luu, Professional Engineer,
Vice President of Engineering
UltraTech Group of Labs



Date: September 8, 2004

Report Prepared by: Anca Dobre

Tested by: William Truong, RFI Technician

Issued Date: September 8, 2004

Test Dates: Aug. 13 – 18, 2004

- *The results in this Test Report apply only to the sample(s) tested, and the sample tested is randomly selected.*
- *This report must not be used by the client to claim product endorsement by NVLAP or any agency of the US Government.*

UltraTech

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SL2-IN-E-1119R



00-034



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EXHIBIT 1. SUBMITTAL CHECK LIST

Annex No.	Exhibit Type	Description of Contents	Quality Check (OK)
--	Test Report	- Exhibit 1: Submittal check lists - Exhibit 2: Introduction - Exhibit 3: Performance Assessment - Exhibit 4: EUT Operation and Configuration during Tests - Exhibit 5: Summary of test Results - Exhibit 6: Measurement Data - Exhibit 7: Measurement Uncertainty - Exhibit 8: Measurement Methods	OK
1	Test Setup Photos	Radiated Emissions Test Setup Photos	OK
2	External Photos of EUT	External EUT Photos	OK
3	Internal Photos of EUT	Internal EUT Photos	OK
4	Cover Letters	- Letter from Ultratech for Certification Request - Letter from the Applicant to appoint Ultratech to act as an agent - Letter from the Applicant to request for Confidentiality Filing	OK
5	ID Label/Location Info	- ID Label - Location of ID Label	OK
6	Block Diagrams	Block Diagram	OK
7	Schematic Diagrams	Schematics	OK
8	Parts List/Tune Up Info	- Exciter EX21 General Assembly - LF Amplifier LFA21 Component Assembly - BOM - PCB/Encl. Exciter EX21 - BOM - LF Amplifier LFA21	OK
9	Operational Description	Theory of Operation	OK
10	RF Exposure Info	--	N/A
11	Users Manual	RFI D System S21 User's Guide	OK

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File #: LYT-018F15C231
September 8, 2004

All test results contained in this engineering test report are traceable to National Institute of Standards and Technology (NIST)

EXHIBIT 2. INTRODUCTION

2.1. SCOPE

Reference:	FCC Part 15, Subpart C, Sections 15.209 and 15.231(e)
Title:	Telecommunication - Code of Federal Regulations, CFR 47, Part 15
Purpose of Test:	To gain FCC Certification Authorization for Low Power Transmitter operating at 125 kHz and Section 15.231(e) - Momentarily Operation at 433.92 MHz .
Test Procedures:	Both conducted and radiated emissions measurements were conducted in accordance with American National Standards Institute ANSI C63.4 - 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.
Environmental Classification:	Commercial, industrial or business

2.2. RELATED SUBMITTAL(S)/GRANT(S)

None.

2.3. NORMATIVE REFERENCES

Publication	Year	Title
FCC CFR Parts 0-19	2003	Code of Federal Regulations, Title 47 – Telecommunication
ANSI C63.4	2003	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
CISPR 22 & EN 55022	2003 2003	Limits and Methods of Measurements of Radio Disturbance Characteristics of Information Technology Equipment
CISPR 16-1	2003	Specification for Radio Disturbance and Immunity measuring apparatus and methods

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EXHIBIT 3. PERFORMANCE ASSESSMENT

3.1. CLIENT INFORMATION

APPLICANT	
Name:	Lyngsoe Systems Ltd.
Address:	5570 Kennedy Road, Unit B Mississauga, Ontario Canada, L4Z 2A9
Contact Person:	Marioara Huzum Phone #: (905) 501-1533/ext. 231 Fax #: (905) 501-1538 Email Address: mhu@lyngsoesystems.com

MANUFACTURER	
Name:	Lyngsoe Systems Ltd.
Address:	5570 Kennedy Road, Unit B Mississauga, Ontario Canada, L4Z 2A9
Contact Person:	Donald Ferguson Phone #: (905) 501-1533/ext.221 Fax #: (905) 501-1538 Email Address: dfe@lyngsoesystems.com

3.2. EQUIPMENT UNDER TEST (EUT) INFORMATION

The following information (with the exception of the Date of Receipt) has been supplied by the applicant.

Brand Name:	Lyngsoe Systems Ltd.
Product Name:	Exciter
Model Name or Number:	EX21L
Serial Number:	A015972
Type of Equipment:	Low Power Transmitter
Power Input Source:	External power supply TRM 95/120V
Primary User Functions of EUT:	This equipment is part of the RFID System S21 and together with Reader RD21 creates a Reading Point for RFID Systems. The main function of the Exciter EX21C is to generate the LF field, which will "excite" transponders PT21. 433.92 MHz signal is used to check the integrity of RFID Systems.

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3.3. EUT'S TECHNICAL SPECIFICATIONS

Transmitter @ 125 kHz	
Equipment Type:	Base station (fixed use)
Intended Operating Environment:	Commercial, industrial or business
RF Output Power Rating:	0.0 Watt
Operating Frequency Range:	125 kHz
Duty Cycle:	50.0%
20 dB Bandwidth:	8.65 kHz
Modulation Type:	Pulse modulation with recognition coding
Oscillator Frequencies	20MHz, 13.56 MHz
Antenna Connector Type:	Integral, permanently attached loop antenna
Antenna Description:	Manufacturer: Lyngsoe Systems Ltd. Type: 125 kHz Loop Antenna Model: 1x2 meters Frequency Range: 125 kHz In/Out Impedance: 50 Ohms

Transmitter @ 433.92 MHz	
Equipment Type:	Base station (fixed use)
Intended Operating Environment:	Commercial, industrial or business
RF Output Power Rating:	0.0 Watt
Operating Frequency Range:	433.92 MHz
Duty Cycle:	26.95%
20 dB Bandwidth:	46.5 kHz
Modulation Type:	Pulse modulation with recognition coding
Oscillator Frequencies	20MHz, 13.56 MHz
Antenna Connector Type:	Integral antenna (part of the printed circuit board) housed inside the enclosure.
Antenna Description:	Manufacturer: Lyngsoe Systems Ltd. Type: Integral Model: Printed on PCB Frequency Range: 433.92 MHz In/Out Impedance: 50 Ohms

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3.4. LIST OF EUT'S PORTS

Port Number	EUT's Port Description	Number of Identical Ports	Connector Type	Cable Type (Shielded/Non-shielded)
1	22 Vac port	1	3 pole type RIA 31137103	Non-shielded

3.5. ANCILLARY EQUIPMENT

None.

3.6. GENERAL TEST SETUP

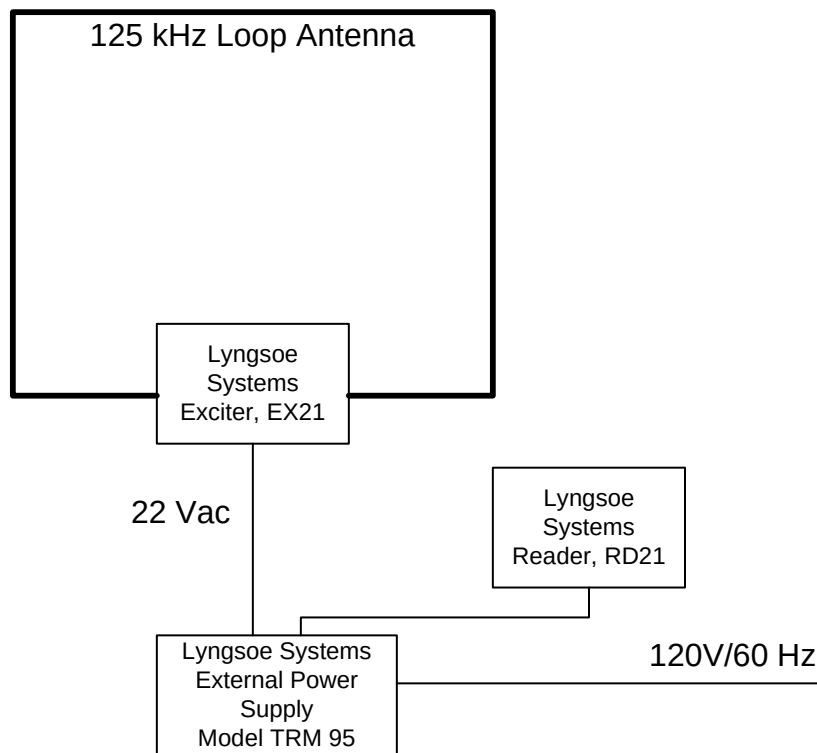


EXHIBIT 4. EUT OPERATION CONDITIONS AND CONFIGURATIONS DURING TESTS

4.1. CLIMATE TEST CONDITIONS

The climate conditions of the test environment are as follows:

Temperature:	21°C
Humidity:	51%
Pressure:	102 kPa
Power Input Source:	22 Vac

4.2. OPERATIONAL TEST CONDITIONS & ARRANGEMENT FOR TESTS

Operating Modes:	The EUT was set to transmit continuously by means of special setting of jumpers on the printed circuit board for testing purpose only.
Special Test Software:	None
Special Hardware Used:	None
Transmitter Test Antenna:	The EUT is tested with the antenna fitted in a manner typical of normal intended use as an integral antenna equipment.

Transmitter Test Signals	
Frequencies:	125 kHz & 433. 92 MHz

EXHIBIT 5. SUMMARY OF TEST RESULTS

5.1. LOCATION OF TESTS

All of the measurements described in this report were performed at Ultratech Group of Labs located in the city of Oakville, Province of Ontario, Canada.

- AC Powerline Conducted Emissions were performed in UltraTech's shielded room, 24'(L) by 16'(W) by 8'(H).
- Radiated Emissions were performed at the Ultratech's 3 Meter Open Field Test Site (OFTS) situated in the Town of Oakville, province of Ontario.

The above sites have been calibrated in accordance with ANSI C63.4, and found to be in compliance with the requirements of Sec. 2.948 of the FCC Rules. The descriptions and site measurement data of the Oakville Open Field Test Site has been filed with FCC office (FCC File No.: 31040/SIT 1300B3) and Industry Canada office (Industry Canada File No.: IC2049). Last Date of Site Calibration: February 17, 2004.

5.2. APPLICABILITY & SUMMARY OF EMC EMISSIONS TEST RESULTS

FCC Sections	Test Requirements	Compliance (Yes/No)
FCC 15.209 - LOW POWER TRANSMITTER @ 125 kHz		
15.203	Antenna requirement (The transmitter shall use a transmitting antenna that is an integral part of the device).	Yes. Permanently attached loop antenna.
15.215 (c)	20 dB Bandwidth	Yes
15.209 & 15.205	Transmitter Radiated Emissions – Fundamental, Harmonic and Spurious	Yes
15.107(a)	AC Power Line Conducted Emissions Measurements (Transmit & Receive)	Yes (See Note 1)
FCC 15.231(e) – MOMENTARILY TRANSMITTER @ 433.92 MHz		
15.203	Antenna requirement (The transmitter shall use a transmitting antenna that is an integral part of the device).	Yes. Integral antenna (part of the printed circuit board, housed inside the enclosure).
15.231(e)(a)	Provisions of FCC 15.231(e)	Yes
15.231(e)(a) & (b)	Transmitter Radiated Emissions - Fundamental, Harmonic and Spurious	Yes
15.231(c)	20 dB Bandwidth	Yes
15.107(a)	AC Power Line Conducted Emissions Measurements (Transmit & Receive)	Yes (See Note 2)

Note 1: The digital circuits portion of the EUT have been tested and verified to comply with FCC Part 15, Subpart B, Class B Digital Devices, the associated Radio Receiver is exempted from FCC authorization. The engineering test report can be provided upon FCC requests.

Note 2: The digital circuits portion and Radio Receiver of the EUT have been tested and verified to comply with FCC Part 15, Subpart B, Class B Digital Devices. The engineering test report can be provided upon FCC requests.

5.3. MODIFICATIONS INCORPORATED IN THE EUT FOR COMPLIANCE PURPOSES

None.

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EXHIBIT 6. MEASUREMENTS, EXAMINATIONS & TEST DATA FOR EMC EMISSIONS

6.1. TEST PROCEDURES

This section contains test results only. Details of test methods and procedures can be found in Exhibit 8 of this report.

6.2. MEASUREMENT UNCERTAINTIES

The measurement uncertainties stated were calculated in accordance with requirements of UKAS Document NIS 81 with a confidence level of 95%. Please refer to Exhibit 7 for Measurement Uncertainties.

6.3. MEASUREMENT EQUIPMENT USED

The measurement equipment used complied with the requirements of the Standards referenced in the Methods & Procedures ANSI C64-3, FCC 15.209 and CISPR 16-1.

6.4. METHOD OF MEASUREMENTS

The measurements were performed in accordance with Ultratech Test Procedures, File # ULTR P001-2004 and ANSI C63.4.

6.5. ESSENTIAL/PRIMARY FUNCTIONS AS DECLARED BY THE MANUFACTURER

The essential function of the EUT is to correctly communicate data to and from radios over RF link.

6.6. 125 kHz TRANSMITTER RADIATED EMISSIONS @ 3 METERS – FUNDAMENTAL & SPURIOUS EMISSIONS [§§15.209 & 15.205]

6.6.1. Limits

- The fundamental frequency shall not fall within any restricted frequency band specified in 15.205.
- All rf other emissions shall not exceed the general radiated emission limits specified in §15.209(a).

FCC 47 CFR, Part 15, Subpart C, Section 15.205(a) - Restricted Frequency Bands

MHz	MHz	MHz	GHz
0.090–0.110	16.42–16.423	399.9–410	4.5–5.15
0.495–0.505	16.69475–16.69525	608–614	5.35–5.46
2.1735–2.1905	16.80425–16.80475	960–1240	7.25–7.75
4.125–4.128	25.5–25.67	1300–1427	8.025–8.5
4.17725–4.17775	37.5–38.25	1435–1626.5	9.0–9.2
4.20725–4.20775	73–74.6	1645.5–1646.5	9.3–9.5
6.215–6.218	74.8–75.2	1660–1710	10.6–12.7
6.26775–6.26825	108–121.94	1718.8–1722.2	13.25–13.4
6.31175–6.31225	123–138	2200–2300	14.47–14.5
8.291–8.294	149.9–150.05	2310–2390	15.35–16.2
8.362–8.366	156.52475–156.52525	2483.5–2500	17.7–21.4
8.37625–8.38675	156.7–156.9	2655–2900	22.01–23.12
8.41425–8.41475	162.0125–167.17	3260–3267	23.6–24.0
12.29–12.293	167.72–173.2	3332–3339	31.2–31.8
12.51975–12.52025	240–285	3345.8–3358	36.43–36.5
12.57675–12.57725	322–335.4	3600–4400	Above 38.6
13.36–13.41			

FCC 47 CFR, Part 15, Subpart C, Section 15.209(a)
-- Field Strength Limits within Restricted Frequency Bands --

Frequency (MHz)	Field Strength Limits (microvolts/m)	Distance (Meters)
0.009 - 0.490	2,400 / F (KHz)	300
0.490 - 1.705	24,000 / F (KHz)	30
1.705 - 30.0	30	30
30 – 88	100	3
88 – 216	150	3
216 – 960	200	3
Above 960	500	3

6.6.2. Method of Measurements

Refer to ULTRATECH Test Procedures, File # ULTR P001-2004 and ANSI C63-4.

Note: Because the EUT employs pulsed operation, the unit was modified for continuous operation and the readings were corrected by subtracting the peak-average correction factor derived from the appropriate duty cycle calculation. See § 15.35 (c).

6.6.3. Test Equipment List

Test Instruments	Manufacturer	Model No.	Serial No.	Frequency Range
Spectrum Analyzer/ EMI Receiver	Advantest	R3271	15050203	100 Hz to 32 GHz with external mixer for frequency above 32 GHz
Microwave Amplifier	Hewlett Packard	HP 83017A		1 GHz to 26.5 GHz
Biconilog Antenna	EMCO	3143	1029	20 MHz to 2 GHz
Horn Antenna	EMCO	3155	9701-5061	1 GHz – 18 GHz
Horn Antenna	EMCO	3160-09	..	18 GHz – 26.5 GHz
Horn Antenna	EMCO	3160-10	..	26.5 GHz – 40 GHz
Mixer	Tektronix	118-0098-00	..	18 GHz – 26.5 GHz
Mixer	Tektronix	119-0098-00	..	26.5 GHz – 40 GHz

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6.6.4. Test Data

Frequency (MHz)	RF Peak Level (dBμV/m)	RF Avg Level (dBμV/m)	Antenna Plane (H/V)	Limit 15.209 (dBμV/m)	Limit Margin (dB)	Pass/Fail	Distance (m)
0.125	82.7	76.7	V	85.7	-9.0	Pass	30
0.125	82.1	76.1	H	85.7	-9.6	Pass	30
- The emissions were scanned from 10 kHz to 1 GHz and all spurious emissions were more than 20 dB below the permissible limits. - Highest measurements were recorded when the transmitter was tested with 3 different orthogonal positions.							

Remarks:

- (1) Duty Cycle = 0.50 (Tx on = Tx off)

Peak-to-Average factor = $20 \cdot \log(0.50) = -6.02$ dB

Please refer to the following plots for detailed duty cycle measurements.

- (2) The 300m limit was converted to 30 m using cube factor (x) as it was found by measurements as follows:

- Maximum E-field at 10 meters distance: 115.79 dBμV/m (vertical)
- Maximum E-field at 30 meters distance: 82.71 dBμV/m (vertical)

Difference of measurement between 10 m & 30 m: $\Delta E = 115.79 - 82.71 = 33.08$ dB

$\Delta E = 20 \cdot \log(30/10)^x = 33.08$ dB or $x = 33.08 / (20 \cdot \log 3) = 3.4$

Therefore the limit for 125 kHz at 30 meters were calculated as:

$\text{Limit}_{30m} = \text{Limit}_{300m} + 20 \cdot \log(300/30)^3 = 20 \cdot \log[2400/125] + 60 = 85.7$ dBμV/m

Duty Cycle Measurements

6:15 AM 8/15/04 Ultratech 10m Open Area Test Site



L00P6502 15:08:18 OCT 30, 2002

ACTV DET: PEAK
MEAS DET: PEAK QP AVG
MKR 750.00 μ sec
106.81 dB μ V/m

LOG REF 120.0 dB μ V/m

10

dB/

ATN

40 dB

VA SB

SC FC

ACORR

CENTER 125.15 kHz

#IF BW 1.0 kHz

#AVG BW 3 kHz

SPAN 0 Hz

#SWP 100 msec

11:59 AM 8/17/04 Ultratech 10m Open Area Test Site



L00P6502 15:08:18 OCT 30, 2002

ACTV DET: PEAK
MEAS DET: PEAK QP AVG
MKR 675.00 μ sec
.17 dB

LOG REF 132.0 dB μ V/m

10

dB/

ATN

50 dB

VA SB

SC FC

ACORR

CENTER 125 kHz

#IF BW 100 kHz

AVG BW 30 kHz

SPAN 0 Hz

#SWP 15.0 msec

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6.7. 125 kHz TRANSMITTER - 20 dB BANDWIDTH [§15.215(c)]

6.7.1. Limits

The rf spectrum shall not stay in the restricted band specified in §15.215.

6.7.2. Method of Measurements

The measurements were performed in accordance with Ultratech Test Procedures, File # ULTR P001-2004 and ANSI C63.4:2003.

The transmitter output was loosely coupled to the spectrum analyzer through a receiving antenna. The bandwidth of the fundamental frequency was measured with the spectrum analyzer with the resolution bandwidth of the spectrum analyzer set per ANSI 63-4, Sec. 13.1.6.2.

6.7.3. Test Equipment List

Test Instruments	Manufacturer	Model No.	Serial No.	Frequency Range
Spectrum Analyzer/ EMI Receiver	Hewlett Packard	HP 8593EM	3412A00103	9 kHz – 26.5 GHz

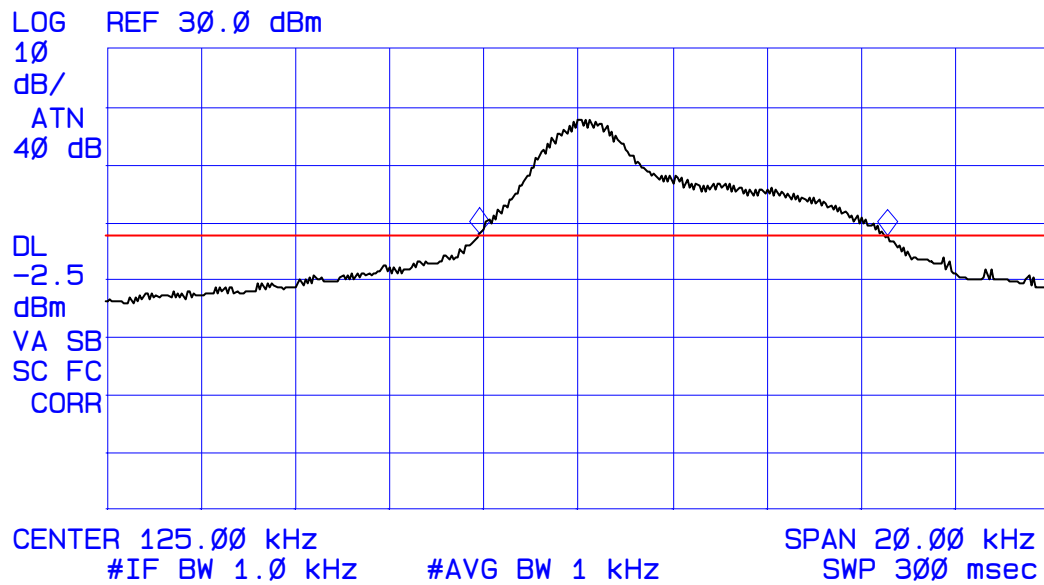
6.7.4. Test Data

Channel Frequency (kHz)	20 dB Bandwidth (kHz)	Maximum Limit (kHz)	Pass/Fail
125	8.65	N/A	N/A

Plot #3:
20 dB Occupied Bandwidth
Test Frequency: 125 kHz

hp

ACTV DET: PEAK
MEAS DET: PEAK QP AVG
MKR 8.65 kHz
-.25 dB



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6.8. 433.92 MHz TRANSMITTER – PROVISIONS OF [§15.231(e) (a)] FOR PERIODIC OPERATION

6.8.1. Engineering Analysis

FCC PROVISSIONS	ANALYSIS ON COMPLIANCE
Permitted Type of Devices (alarm systems, door opener, remote switches etc ...)	RFID system
Prohibited Type of Devices (radio control of toys)	N/A
Prohibited Transmission Type (voice, video or data continuous transmission)	Recognition codes to identify other particular component as part of the system
A Manually Operated Transmitter (shall employ with the switch that automatically deactivate the transmitter within 5 seconds of being released)	The transmitter is automatically deactivated within less than 1 second.
Periodic Transmissions: at regular predetermined intervals are not permitted. However, polling or supervision transmissions to determine system integrity of transmitter used in security or safety applications are allowed if the periodic rate of transmission does not exceed one transmission of not more than one second duration per hour for the transmitter Internal Radiators which are not employed for radio control purposes during emergencies involving fire, security, and safety of life, when activated to signal an alarm, may operate during the pendency of the alarm condition.	N/A

6.9. 433.92 MHz TRANSMITTER RADIATED EMISSIONS @ 3 METERS – FUNDAMENTAL & SPURIOUS EMISSIONS [§§15.231(e), 15.209 & 15.205]

6.9.1. Limits

The RF radiated emissions measured at 3 Meters distance shall not exceed the field strength below:

Fundamental Frequency (MHz)	Average Field Strength Limits (µV/m)	
	Fundamental	Harmonic/Spurious
260 - 470 MHz	1,500 to 5,000	150 to 500

LIMIT @ 433.92 MHz = 72.9 dBµV/m at 3 meters

HARMONIC/SPURIOUS LIMIT (outside restricted bands) = 52.9 dBµV/m

All other emissions inside restricted bands specified in §15.205(a) shall not exceed the general radiated emission limits specified in §15.209(a).

Remarks:

- Applies to harmonics/spurious emissions that fall in the restricted bands listed in Section 15.205. The maximum permitted average field strength is listed in Section 15.209.
- §15.237(c)** - The emission limits as specified above are based on measurement instrument employing an average detector. The provisions in **§15.35** for limiting peak emissions apply.

FCC 47 CFR, Part 15, Subpart C, Section 15.205(a) - Restricted Frequency Bands

MHz	MHz	MHz	GHz
0.090–0.110	16.42–16.423	399.9–410	4.5–5.15
0.495–0.505	16.69475–16.69525	608–614	5.35–5.46
2.1735–2.1905	16.80425–16.80475	960–1240	7.25–7.75
4.125–4.128	25.5–25.67	1300–1427	8.025–8.5
4.17725–4.17775	37.5–38.25	1435–1626.5	9.0–9.2
4.20725–4.20775	73–74.6	1645.5–1646.5	9.3–9.5
6.215–6.218	74.8–75.2	1660–1710	10.6–12.7
6.26775–6.26825	108–121.94	1718.8–1722.2	13.25–13.4
6.31175–6.31225	123–138	2200–2300	14.47–14.5
8.291–8.294	149.9–150.05	2310–2390	15.35–16.2
8.362–8.366	156.52475–156.52525	2483.5–2500	17.7–21.4
8.37625–8.38675	156.7–156.9	2655–2900	22.01–23.12
8.41425–8.41475	162.0125–167.17	3260–3267	23.6–24.0
12.29–12.293	167.72–173.2	3332–3339	31.2–31.8
12.51975–12.52025	240–285	3345.8–3358	36.43–36.5
12.57675–12.57725	322–335.4	3600–4400	Above 38.6
13.36–13.41			

FCC 47 CFR, Part 15, Subpart C, Section 15.209(a) -- Field Strength Limits within Restricted Frequency Bands --

Frequency (MHz)	Field Strength Limits (microvolts/m)	Distance (Meters)
0.009 - 0.490	2,400 / F (KHz)	300
0.490 - 1.705	24,000 / F (KHz)	30
1.705 - 30.0	30	30
30 – 88	100	3
88 – 216	150	3
216 – 960	200	3
Above 960	500	3

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6.9.2. Method of Measurements

Refer to ULTRATECH Test Procedures, File # ULTR P001-2004 and ANSI C63.4.

Note: Because the EUT employs pulsed operation, the unit was modified for continuous operation and the readings were corrected by subtraction the peak-average correction factor derived from the appropriate duty cycle calculation. See §15.35 (c).

6.9.3. Test Equipment List

Test Instruments	Manufacturer	Model No.	Serial No.	Frequency Range
Spectrum Analyzer/ EMI Receiver	Hewlett Packard	HP 8593EM	3412A00103	9 kHz – 26.5 GHz
Peak Power Meter & Peak Power Sensor	Hewlett Packard	8900 8481A	2131A00124 2551A01965	0.1-18 GHz 50 Ohms Input
Microwave Amplifier	Hewlett Packard	HP 83017A		1 GHz to 26.5 GHz
Active Loop Antenna	EMCO	6507	8906-1167	1 kHz – 30 MHz
Log Periodic/Bow-Tie Antenna	EMCO	3143	1029	20 - 1000 MHz
Horn Antenna	EMCO	3155	9701-5061	1 GHz – 18 GHz

6.9.4. Test Data

Frequency (MHz)	Peak E-Field @3m (dBµV/m)	Average E-Field @3m (dBµV/m)	Antenna Plane (V/H)	Average (1) Limit @3m (dBµV/m)	Restricted (2) Band Limits @3m (dBµV/m)	Margin (dB)
433.92	77.5	66.1	V	72.9	46.0	-6.8
433.92	73.5	62.1	H	72.9	46.0	-10.8
1735.90	48.4	37.0	V	52.9	54.0	-15.9
1735.90	48.4	37.0	H	52.9	54.0	-15.9
2169.80	46.3	34.9	V	52.9	54.0	-18.0
2169.80	48.1	36.7	H	52.9	54.0	-16.1
2603.80	47.8	36.4	V	52.9	54.0	-16.5
2603.80	47.8	36.4	H	52.9	54.0	-16.4

- The emissions were scanned from 10 MHz to 5 GHz and all emissions less than 20 dB below the limits were recorded.
- The transmitter was placed in three different orthogonal positions for searching maximum field strength level.

Remarks:

- Duty Cycle = $7 \times 3.85 \text{ ms} / 100 \text{ ms} = 0.2695$
- Peak-to-Average Factor = $20 \times \log(0.2695) = -11.39 \text{ dB}$

Please refer to the following plots for detailed duty cycle measurements.

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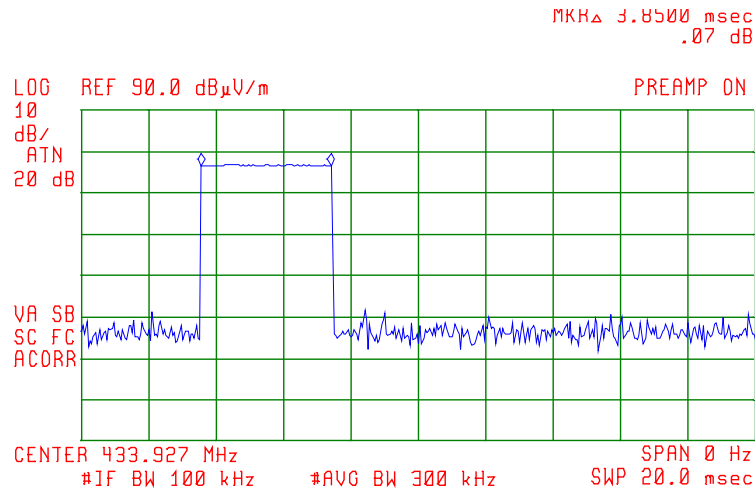
3000 Bristol Circle, Oakville, Ontario, Canada L6H 6G4
Tel. #: 905-829-1570, Fax. #: 905-829-8050, Email: vic@ultratech-labs.com, Website: <http://www.ultratech-labs.com>

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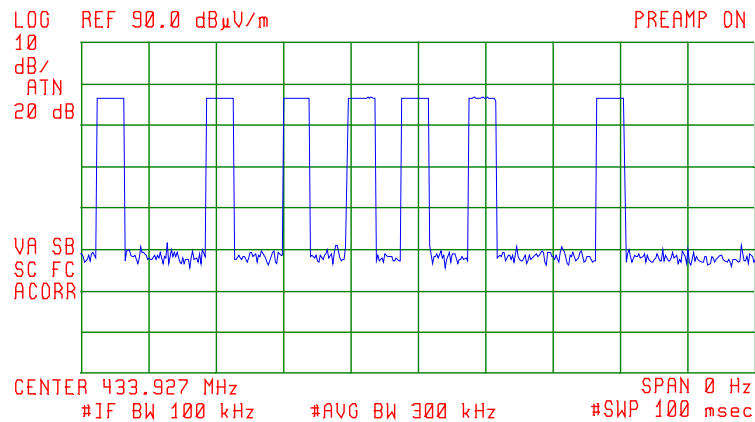
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All test results contained in this engineering test report are traceable to National Institute of Standards and Technology (NIST)

Duty Cycle measurements



 3 METERS SEMI-ANECHOIC ULTRATECH LABS
ACTV DET: PEAK
MEAS DET: PEAK QP AVG



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6.10. 433.92 MHz TRANSMITTER - 20 dB BANDWIDTH [§15.231(c)]

6.10.1. Limits

The 20dB bandwidth of the emission shall be no more than 0.25% of the centre frequency for devices operating above 70MHz and below 900 MHz.

6.10.2. Method of Measurements

Refer to §15.231(e)(c) & ANSI C63-4.

The transmitter output was loosely coupled to the spectrum analyzer through a receiving antenna and the bandwidth of the fundamental frequency was measured with the spectrum analyzer with the resolution bandwidth of the spectrum analyzer set per ANSI C63-4, Sec. 13.1.6.2

6.10.3. Test Equipment List

Test Instruments	Manufacturer	Model No.	Serial No.	Frequency Range
Spectrum Analyzer/ EMI Receiver	Hewlett Packard	HP 8593EM	3412A00103	9 kHz – 26.5 GHz

6.10.4. Test Data

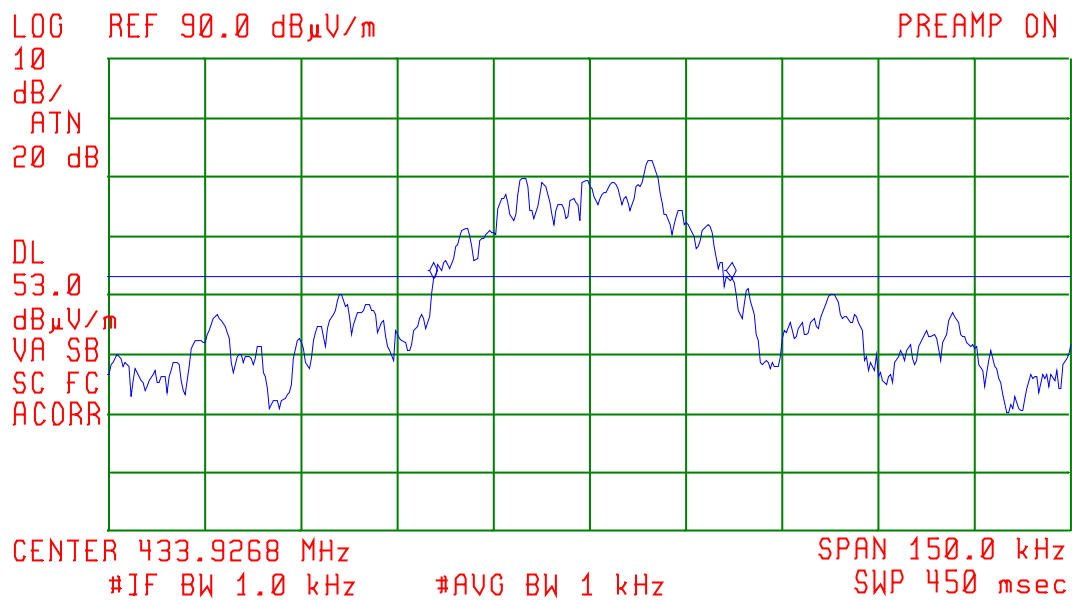
Frequency (MHz)	20 dB Bandwidth (kHz)	Maximum Limit (kHz)	Pass/Fail
433.92	46.5	1085	Pass

20 dB Bandwidth
Test Frequency: 433.92 MHz



3 METERS SEMI-ANECHOIC ULTRATECH LABS

ACTV DET: PEAK
MEAS DET: PEAK QP AVG
MKR Δ 46.5 kHz
-.19 dB



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EXHIBIT 7. MEASUREMENT UNCERTAINTY

The measurement uncertainties stated were calculated in accordance with the requirements of NIST Technical Note 1297 and NIS 81 (1994).

7.1. RADIATED EMISSION MEASUREMENT UNCERTAINTY

CONTRIBUTION (Radiated Emissions)	PROBABILITY DISTRIBUTION	UNCERTAINTY (+ dB)	
		3 m	10 m
Antenna Factor Calibration	Normal (k=2)	± 1.0	± 1.0
Cable Loss Calibration	Normal (k=2)	± 0.3	± 0.5
EMI Receiver specification	Rectangular	± 1.5	± 1.5
Antenna Directivit	Rectangular	± 0.5	± 0.5
Antenna factor variation with height	Rectangular	± 2.0	± 0.5
Antenna phase center variation	Rectangular	0.0	± 0.2
Antenna factor frequency interpolation	Rectangular	± 0.25	± 0.25
Measurement distance variation	Rectangular	± 0.6	± 0.4
Site imperfections	Rectangular	± 2.0	± 2.0
Mismatch: Receiver VRC $\Gamma_1 = 0.2$ Antenna VRC $\Gamma_R = 0.67(\text{Bi}) 0.3 (\text{Lp})$ Uncertainty limits $20\text{Log}(1 \pm \Gamma_1 \Gamma_R)$	U-Shaped	+1.1 -1.25	± 0.5
System repeatability	Std. Deviation	± 0.5	± 0.5
Repeatability of EUT		-	-
Combined standard uncertainty	Normal	+2.19 / -2.21	+1.74 / -1.72
Expanded uncertainty U	Normal (k=2)	+4.38 / -4.42	+3.48 / -3.44

Calculation for maximum uncertainty when 3m biconical antenna including a factor of k = 2 is used:

$$U = 2u_c(y) = 2x(+2.19) = +4.38 \text{ dB} \quad \text{And} \quad U = 2u_c(y) = 2x(-2.21) = -4.42 \text{ dB}$$

EXHIBIT 8. MEASUREMENT METHODS

8.1. GENERAL TEST CONDITIONS

The following test conditions shall be applied throughout the tests covered in this report.

8.1.1. Normal temperature and humidity

- Normal temperature: +15°C to +35°C
- Relative Humidity: +20% to 75%

The actual values during tests shall be recorded in the test report.

8.1.2. Normal power source

8.1.2.1. Mains Voltage

The nominal test voltage of the equipment to be connected to mains shall be the nominal mains voltage which is the declared voltage or any of the declared voltages for which the equipment was designed.

The frequency of test power source corresponding to the AC mains shall be between 59 Hz and 61 Hz.

8.1.2.2. Battery Power Source

For operation from battery power sources, the nominal test voltage shall be as declared by the equipment manufacturer. This shall be recorded in the test report.

8.1.3. Operating Condition of Equipment under Test

- All tests were carried out while the equipment operated at the following frequencies:
 - The lowest operating frequency,
 - The middle operating frequency and
 - The highest operating frequency
- Modulation were applied using the Test Data sequence
- The transmitter was operated at the highest output power, or in the case the equipment able to operate at more than one power level, at the lowest and highest output powers

8.2. RADIATED EMISSIONS

For both conducted and radiated measurements, the spurious emissions were scanned from the lowest frequency generated by the EUT or 10 MHz whichever is lower to 10th harmonic of the highest frequency generated by the EUT.

- The radiated emission measurements were performed at the UltraTech's 3 Meter Open Field Test Site (OFTS) situated in the Town of Oakville, province of Ontario. The Attenuation Characteristics of OFTS have been filed to FCC, Industry Canada, ACA/Austel, NVLap and ITI.
- Radiated emissions measurements were made using the following test instruments:
 1. Calibrated EMCO BiconiLog antenna in the frequency range from 30 MHz to 2000 MHz.
 2. Calibrated Emco Horn antennas in the frequency range above 1000 MHz (1GHz - 40 GHz).
 3. The test is required for any spurious emission or modulation product that falls in a Restricted Band, as defined in Section 15.205. It must be performed with the highest gain of each type of antenna proposed for use with the EUT. Use the following spectrum analyzer settings:
 - RBW = 100 kHz for $f < 1\text{GHz}$ and $\text{RBW} = 1\text{ MHz}$ for $f \geq 1\text{ GHz}$
 - VBW = RBW
 - Sweep = auto
 - Detector function = peak
 - Trace = max hold
 - Follows the guidelines in ANSI C63.4-2003 with respect to maximizing the emission by rotating the EUT, measuring the emission while the EUT is situated in three orthogonal planes (if appropriate), adjusting the measurement antenna height and polarization, etc.. A pre-amp and highpass filter are required for this test, in order to provide the measuring system with sufficient sensitivity.
 - Allow the trace to stabilize.
 - The peak reading of the emission, after being corrected by the antenna correction factor, cable loss, pre-amp gain, etc.... is the peak field strength which comply with the limit specified in Section 15.35(b)

Calculation of Field Strength:

The field strength is calculated by adding the calibrated antenna factor and cable factor, and subtracting the Amplifier gain (if any) from the measured reading. The basic equation with a sample calculation is as follows:

$$\text{FS} = \text{RA} + \text{AF} + \text{CF} - \text{AG}$$

Where

FS	=	Field Strength
RA	=	Receiver/Analyzer Reading
AF	=	Antenna Factor
CF	=	Cable Attenuation Factor
AG	=	Amplifier Gain

Example: If a receiver reading of 60.0 dB μ V is obtained, the antenna factor of 7.0 dB/m and cable factor of 1.0 dB are added, and the amplifier gain of 30 dB is subtracted. The actual field strength will be:

$$\text{Field Level} = 60 + 7.0 + 1.0 - 30 = 38.0 \text{ dB}\mu\text{V/m.}$$

$$\text{Field Level} = 10^{(38/20)} = 79.43 \mu\text{V/m.}$$

- Submit this test data
- Now set the VBW to 10Hz, while maintaining all of the other instrument settings. This peak level, once corrected, must comply with the limit specified in Section 15.209. If the dwell time per channel of the hopping signal is less than 100ms, then the reading obtained may be further adjusted by a "duty cycle correction factor", derived from $10\log(\text{dwell time}/100\text{mS})$ in an effort to demonstrate compliance with the 15.209.
- Submit test data

Maximizing The Radiated Emissions:

- The frequencies of emissions was first detected. Then the amplitude of the emissions was measured at the specified measurement distance using required antenna height, polarization, and detector characteristics.
- During this process, cables and peripheral devices were manipulated within the range of likely configuration.
- For each mode of operation required to be tested, the frequency spectrum was monitored. Variations in antenna heights (from 1 meter to 4 meters above the ground plane), antenna polarization (horizontal plane and vertical plane), cable placement and peripheral placement were explored to produce the highest amplitude signal relative to the limit.

The maximum radiated emission for a given mode of operation was found by using the following step-by-step procedure:

Step 1: Monitor the frequency range of interest at a fixed antenna height and EUT azimuth.

Step 2: Manipulate the system cables to produce highest amplitude signal relative to the limit. Note the amplitude and frequency of the suspect signal.

Step 3: Rotate the EUT 360 degrees to maximize the suspected highest amplitude signal. If the signal or another at a different frequency is observed to exceed the previously noted highest amplitude signal by 1 dB or more, go back to the azimuth and repeat Step 2. Otherwise, orient the EUT azimuth to repeat the highest amplitude observation and proceed.

Step 4: Move the antenna over its full allowable range of travel (1 to 4 meters) to maximize the suspected highest amplitude signal. If the signal or another at a different frequency is observed to exceed the previously noted highest amplitude signal by 1 dB or more, return to Step 2 with the highest amplitude observation and proceed.

Step 5: Change the polarization of the antenna and repeat Step 2 through 4. Compare the resulting suspected highest amplitude signal with that found for the other polarization. Select and note the higher of the two signals. This signal is termed the highest observed signal with respect to the limit for this EUT operational mode.

Step 6: The effect of various modes of operation is examined. This is done by varying the equipment modes as steps 2 through 5 are being performed.

After completing steps 1 through 6, record the final highest emission level, frequency, antenna polarization and detector mode of the measuring instrument.