

Test Report C-3912A

Equipment Under Test:	BL654
Requirement(s):	FCC 15.247 RSS-247
Test Date(s):	08/26/2025 – 09/2/2025, 10/7/2025
Prepared for:	Alcon Research LLC Attn: Sergey Marker 20511 Lake Forest Dr. Lake Forest, CA 92630

Report Issued by: Mitchell Freund, EMC Test Engineer	
Signature: 	Date: 10/7/2025
Report Reviewed by: Adam Alger, Sr. Manager, EMC Laboratory	
Signature: 	Date: 10/7/2025
Report Constructed by: Mitchell Freund, EMC Test Engineer	
Signature: 	Date: 09/15/2025

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Company: Alcon Research LLC	Page 1 of 32	Name: BL654
Report: TR3912A		Model: BL654
Quote: NBO-05-2025-008122-1		Serial: Engineering Sample

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Ezurio Test Services in Review

The Ezurio laboratory located at W66 N220 Commerce Court Cedarburg, Wisconsin, 53012 USA is recognized through the following organizations:



A2LA – American Association for Laboratory Accreditation

Accreditation based on ISO/IEC 17025:2017 with Electrical (EMC) Scope

A2LA Certificate Number: 1255.01

Scope of accreditation includes all test methods listed herein unless otherwise noted



Federal Communications Commission (FCC) – USA

Accredited Test Firm Registration Number: 953492

Recognition of two 3 meter Semi-Anechoic Chambers



Innovation, Science and Economic Development Canada

Accredited U.S. Identification Number: US0218

Recognition of two 3 meter Semi-Anechoic Chambers

Company: Alcon Research	Page 3 of 32	Name: BL654
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1 TEST REPORT SUMMARY

During **8/26/2025-9/2/2025, 10/7/2025** the Equipment Under Test (EUT), **BL654**, as provided by **Alcon Research LLC**, was tested to the following requirements:

FCC 15.247, RSS-247, DTS

Requirements	Description	Method	Compliant
FCC: 15.247(a)(2) IC: RSS-247 5.2(1)	Digital Modulation System 6 dB Bandwidth	ANSI C63.10	Pass
FCC: 2.1049 IC: RSS-GEN 6.6	Occupied Bandwidth	ANSI C63.10	Pass
FCC: 15.247(b)(3) IC: RSS-247 5.4(4)	Maximum Conducted Output Power	ANSI C63.10	Pass
FCC: 15.247(e) IC: RSS-247 5.2(2)	Digital Modulation System Power Spectral Density	ANSI C63.10	Pass
FCC: 15.247(d) IC: RSS-247 5.5	RF Spurious Emissions at the Transmitter Antenna Terminal	ANSI C63.10	Pass
FCC: 15.247(d) IC: RSS-GEN 8.10	Spurious Radiated Emissions in Restricted Bands	ANSI C63.10	Pass

Notice:

The results relate only to the item tested as configured and described in this report. Any additional configurations, modes of operation, or modifications made to the equipment under test after the specified test date(s) are at the decision of the client and may not apply to the data seen in this test report.

The decision rule for Pass / Fail assessment to the specification or standard listed in this test report has been agreed upon by the client and laboratory to be as follows:

Measurement Type	Rule
Emissions – Amplitude	1 dB below specified limit
Emissions – Frequency	1% less than the specification
Immunity	Tested at specified level

2 CLIENT INFORMATION

Company Name	Alcon Research LLC
Contact Person	Sergey Marker
Address	20511 Lake Forest Dr. Lake Forest, CA 92630

2.1 Equipment Under Test (EUT) Information

The following information has been supplied by the client

Product Name	BL654
Model Number	BL654
Serial Number	Engineering Sample
Date of Receipt	8/25/2025
Condition	Good
FCC ID	VMCBL654
IC ID	7345A-BL654

2.2 Product Description

The BL654 module is utilized for wireless transmission and reception in the 802.15.4 standard.
Dipole Antenna – 2.37 dBi gain

2.3 Modifications Incorporated for Compliance

None noted at time of test

2.4 Deviations and Exclusions from Test Specifications

None noted at time of test

2.5 Additional Information

802.15.4 DTS Single Data Rate

Channel	Frequency	Power Settings
1 (Low)	2405.0	14
8 (Mid)	2440.0	14
15	2475.0	14
16 (High)	2480.0	5

2.6 Radio Programming

The 802.15.4 radio was programmed using the AlconTestTool software version 1.11 (4/4/2022)

3 REFERENCES

Publication	Edition	Date	AMD 1	AMD 2
FCC eCFR	-	2025	-	-
RSS-GEN	5	2018	2019	2021
RSS-247	3	2023	-	-
ANSI C63.10	-	2020	2024	-

4 UNCERTAINTY SUMMARY

Using the guidance of the following publications the calculated measurement uncertainty represents an expanded uncertainty expressed at approximately the 95 % confidence level, using a coverage factor of $k = 2$.

References
CISPR 16-4-1
CISPR 16-4-2
CISPR 32
ANSI C63.23
A2LA P103
A2LA P103c
ETSI TR 100-028

Measurement Type	Configuration	Uncertainty $\pm$
Radiated Emissions	Biconical Antenna	5.0 dB
Radiated Emissions	Log Periodic Antenna	5.3 dB
Radiated Emissions	Horn Antenna	4.7 dB
AC Line Conducted Emissions	Artificial Mains Network	3.4 dB
Telecom Conducted Emissions	Asymmetric Artificial Network	4.9 dB
Disturbance Power Emissions	Absorbing Clamp	4.1 dB
Radiated Immunity	3 Volts/meter	2.2 dB
Conducted Immunity	CDN/EM/BCI	2.4/3.5/3.4 dB
EFT Burst/Surge	Peak pulse voltage	164 volts
ESD Immunity	15 kV level	1377 Volts

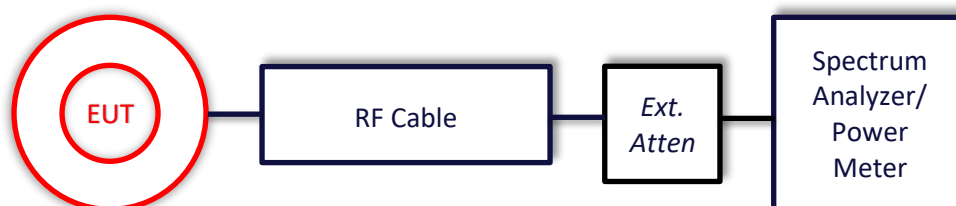
Parameter	ETSI U.C. $\pm$	U.C. $\pm$
Radio Frequency, from F0	1×10^{-7}	0.55×10^{-7}
Occupied Channel Bandwidth	5 %	2 %
RF conducted Power (Power Meter)	1.5 dB	1.2 dB
RF conducted emissions (Spectrum Analyzer)	3.0 dB	1.7 dB
All emissions, radiated	6.0 dB	5.3 dB
Temperature	1° C	0.65° C
Humidity	5 %	2.9 %
Supply voltages	3 %	1 %

5 TEST DATA

5.1 Antenna Port Conducted Emissions

Description of Measurement	The direct measurement of emissions at the antenna port of the EUT is achieved by use of a RF connection to a spectrum analyzer or power meter. The cable and attenuator factors are loaded into the analyzer or power meter allowing for direct measurement readings without the need for further corrections.
Example Calculations	Measurement (dBm) + Cable factor (dB) + External Attenuator (dB) = Corrected Reading (dBm) Margin (dB) = Limit (dBm) – Corrected Reading (dBm)

Block Diagram



Instrumentation

Asset#	Description	Manufacturer	Model#	Serial#	Date	Due Date	Status
AA 960173	Cable	A.H. Systems, Inc.	SAC-26G-1	388	1/28/2025	1/28/2026	Active Verification
EE 960087	Analyzer - Spectrum	Agilent	N9010A	MY53400296	6/1/2025	6/1/2026	Active Calibration
EE 960088	Analyzer - EMI Receiver	Agilent	N9038A	MY51210138	12/10/2024	12/10/2025	Active Calibration
AA 960172	Cable	A.H. Systems, Inc.	SAC-26G-1	387	1/28/2025	1/28/2026	Active Verification
AA 960143	Cable	Gore	EKD01D01048.0	5546519	1/28/2025	1/28/2026	Active Verification
EE 960091	Sensor - RF Power	Anritsu	MA2491A	1249277	4/3/2025	4/3/2026	Active Calibration
EE 960090	Meter - RF Power	Anritsu	ML2495A	1335006	4/3/2025	4/3/2026	Active Calibration
EE 960077	DC Power Supply	GW Instek	GPS-3030DD	EJ810521	1/30/2025	1/30/2026	Active Verification
CC 000210C	Chamber - Enviromental	Thermotron	S-8C	28133	1/30/2025	1/30/2026	Active Verification

5.1.1 Antenna Port Conducted Emissions – 6dB DTS Bandwidth

Operator	Mitchell Freund	QA	Dylan Rosenfeldt
Temperature	22.5°C	R.H. %	48.60%
Test Date	8/26/2025	Location	Bench
Requirement	FCC 15.247 (a)(2) IC: RSS-247 5.2(a)	Method	C63.10 §11.8

Limits: BW greater than 500 kHz

Test Parameters

Frequency	2400—2483.5 MHz	Setup	Conducted
RBW	100 kHz	VBW	300 kHz
Detector(s)	Peak Max Hold	Sweep Time	Auto

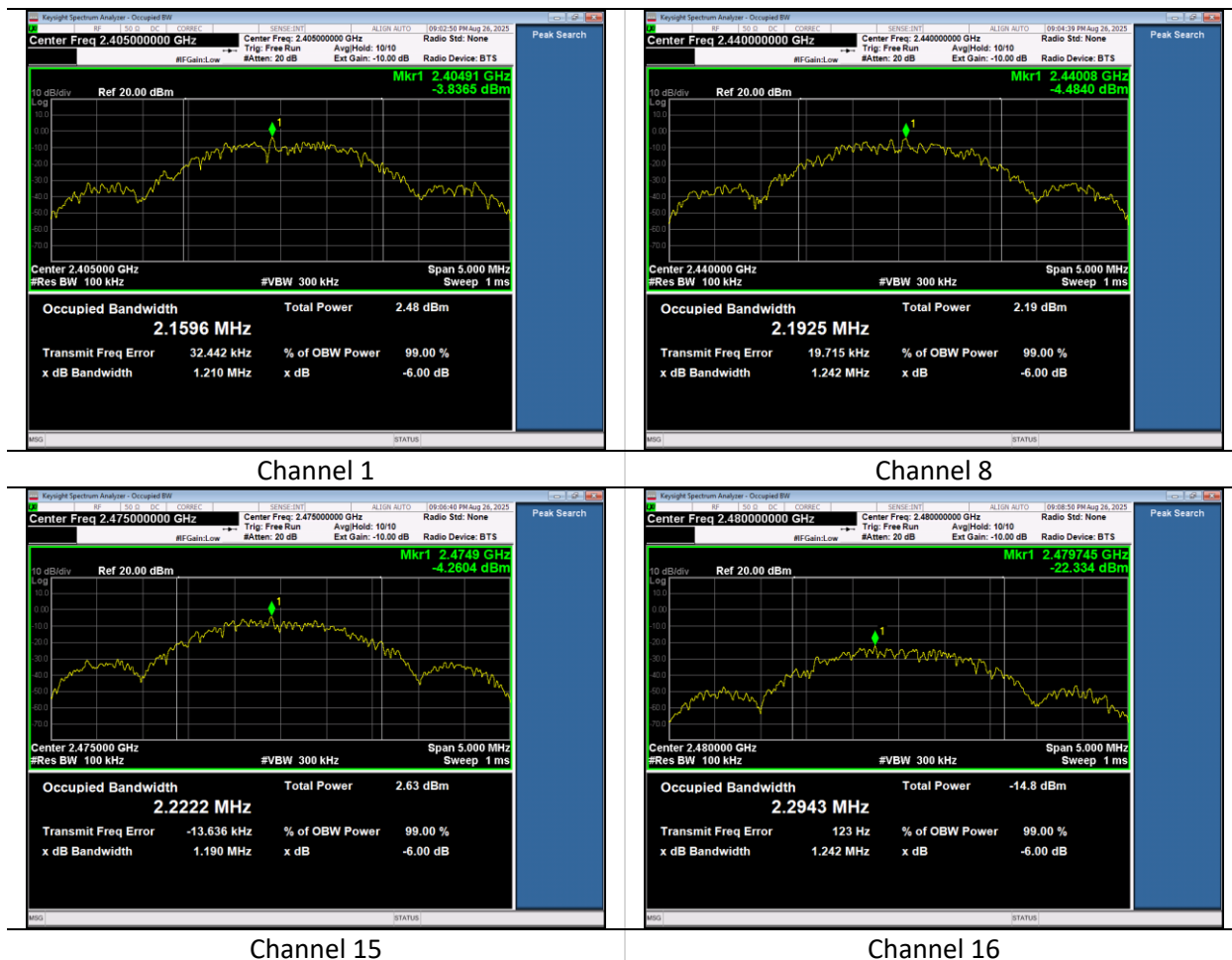
EUT Parameters

Input Power	3.3 VDC	Mode	802.15.4 Tx
Frequency	2405, 2440, 2475, 2480 MHz	Channel	1, 8, 15, 16
Power Settings	14 for Channels 1, 8, 15; 5 for Channel 16		

Table

Channel	Frequency (MHz)	DTS BW (MHz)	Limit (MHz)	Margin (MHz)
1	2404.9	1.2	0.5	0.7
8	2440.1	1.2	0.5	0.7
15	2474.9	1.2	0.5	0.7
16	2479.7	1.2	0.5	0.7

Plots



5.1.2 Antenna Port Conducted Emissions – 99% OBW

Operator	Mitchell Freund	QA	Dylan Rosenfeldt
Temperature	22.5°C	R.H. %	48.60%
Test Date	8/26/2025	Location	Bench
Requirement	FCC 2.1049 IC: RSS-GEN 6.7	Method	C63.10 §6.9

Limits: Reported

Test Parameters

Frequency	2400-2483.5 MHz	Setup	Conducted
RBW	30 kHz	VBW	100 kHz
Detector(s)	Max Peak Hold	Sweep Time	Auto

Data Table:

Channel	Frequency (MHz)	OBW 99% (MHz)
1	2405.0	2.3
8	2440.0	2.2
15	2475.0	2.2
16	2480.0	2.2

Plots:



5.1.3 Antenna Port Conducted Emissions – Max Conducted Output Power

Operator	Mitchell Freund	QA	Dylan Rosenfeldt
Temperature	22.5°C	R.H. %	48.60%
Test Date	8/26/2025	Location	Bench
Requirement	FCC 15.247 (b)(3) IC: RSS-247 5.4(d)	Method	C63.10 §11.9

Limits: <30 dBm

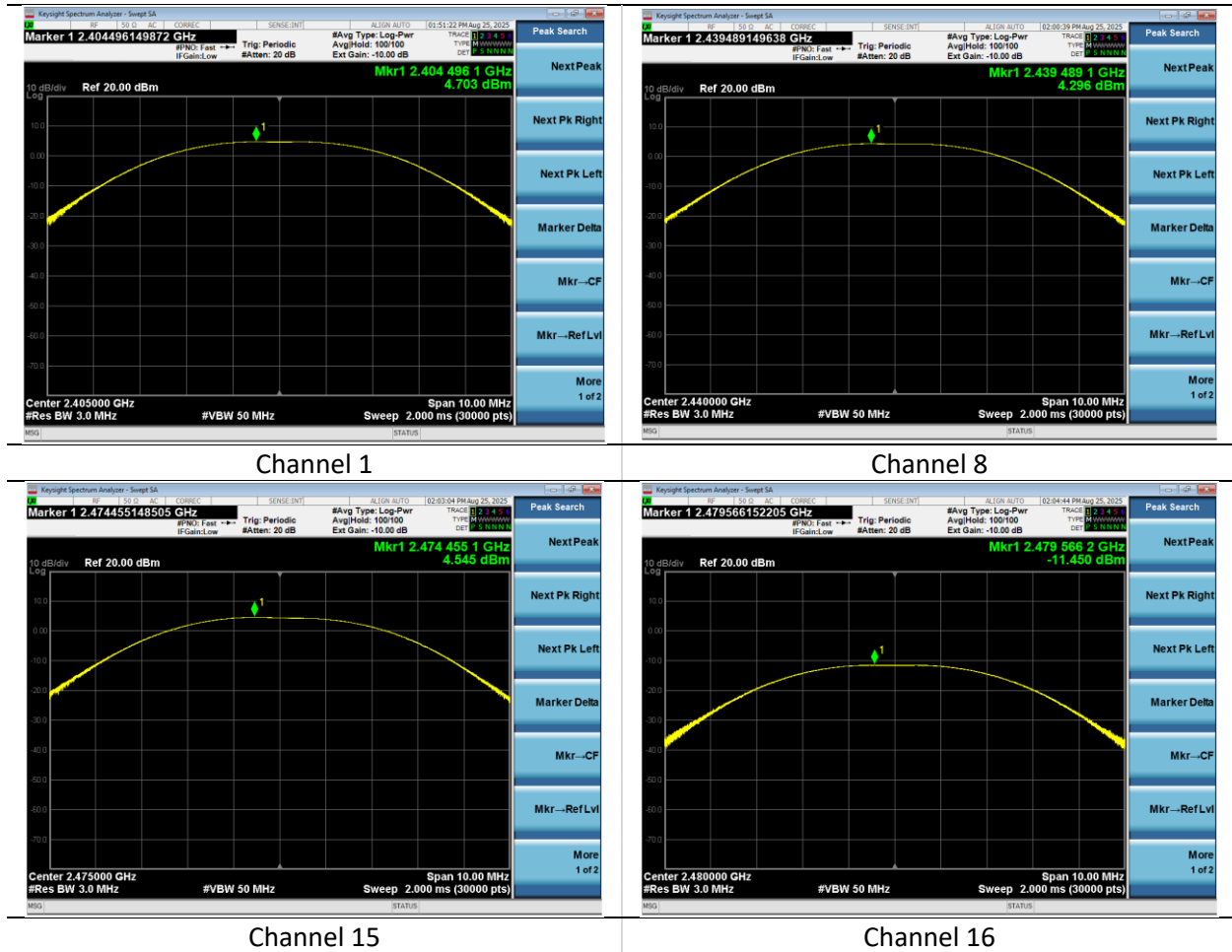
Test Parameters

Frequency	2400-2483.5	Setup	Conducted
RBW	3 MHz	VBW	50 MHz
Detector(s)	Peak Max Hold	Sweep Time	Auto

Data Table:

Channel	Frequency (MHz)	Peak Output Power (dBm)	Limit (dBm)	Margin (dB)
1	2404.5	4.7	30.0	25.3
8	2439.5	4.3	30.0	25.7
15	2474.5	4.5	30.0	25.5
16	2479.6	-11.5	30.0	41.5

Plots:



5.1.4 Antenna Port Conducted Emissions – Peak Power Spectral Density

Operator	Mitchell Freund	QA	Anthony Smith
Temperature	22.6°C	R.H. %	44.6%
Test Date	10/7/2025	Location	Bench
Requirement	FCC 15.247 (e) IC: RSS-247 5.2(b)	Method	C63.10 §11.10

Limits: 8dBm/3kHz

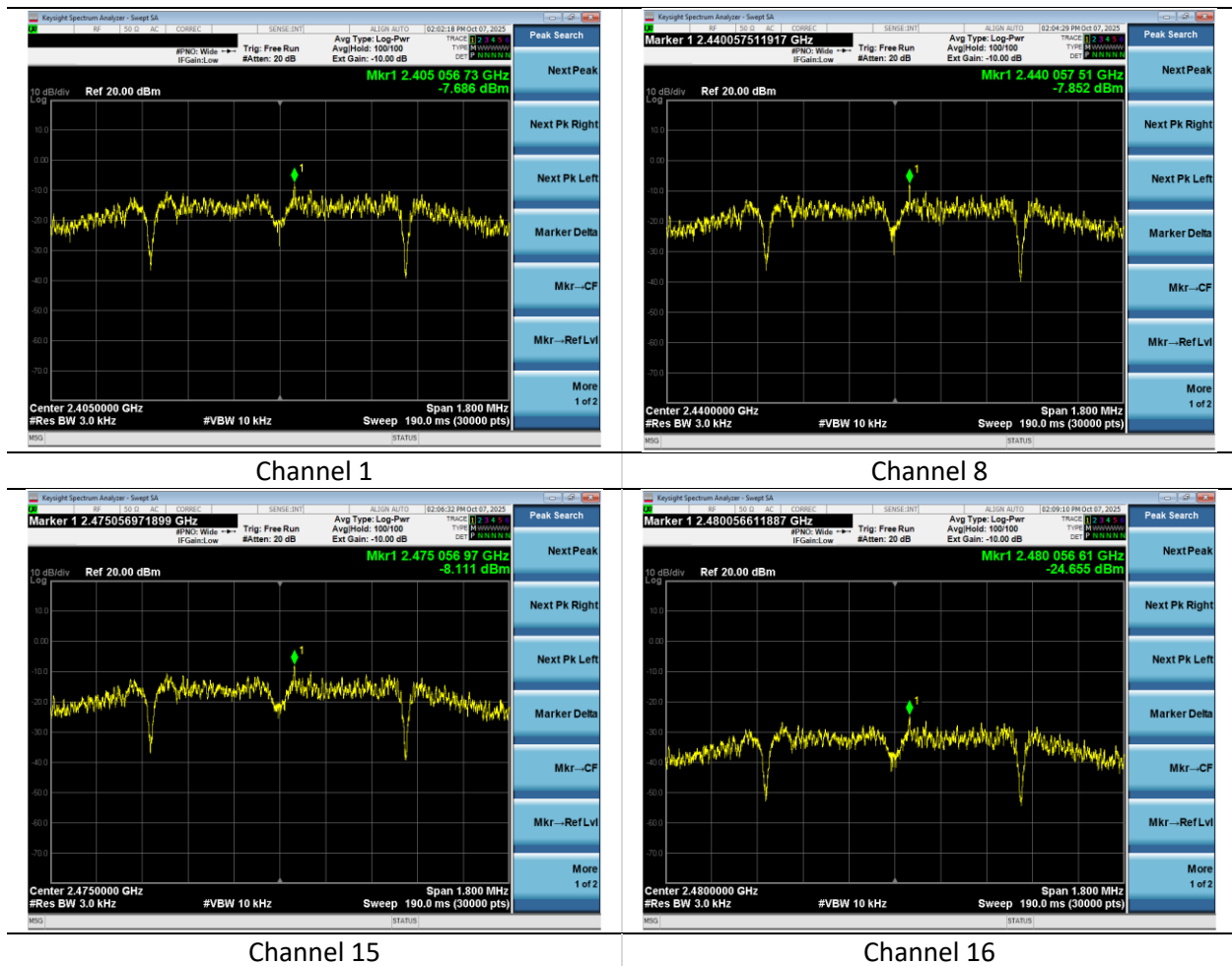
Test Parameters

Frequency	2400-2483.5 MHz	Setup	Conducted
RBW	3 kHz	VBW	10 kHz
Detector(s)	Max Peak Hold	Sweep Time	Auto

Data Table:

Channel	Frequency (MHz)	PSD (dBm/3 kHz)	Limit (dBm/3 kHz)	Margin (dB)
1	2405.0	-7.7	8.0	15.7
8	2440.0	-7.8	8.0	15.8
15	2475.0	-8.1	8.0	16.1
16	2480.0	-24.7	8.0	32.7

Plots:



5.1.5 Antenna Port Conducted Emissions – RF Spurious Emissions at the Antenna Port

Operator	Mitchell Freund	QA	Dylan Rosenfeldt
Temperature	22.5°C	R.H. %	48.60%
Test Date	8/26/2025	Location	Bench
Requirement	FCC: 2.1055 (d) IC: RSS-GEN 6.11	Method	ANSI C63.10 §6.8

Limits: 20dBc

Reference Level = 4.8 dBm

Limit = -15.2 dBm

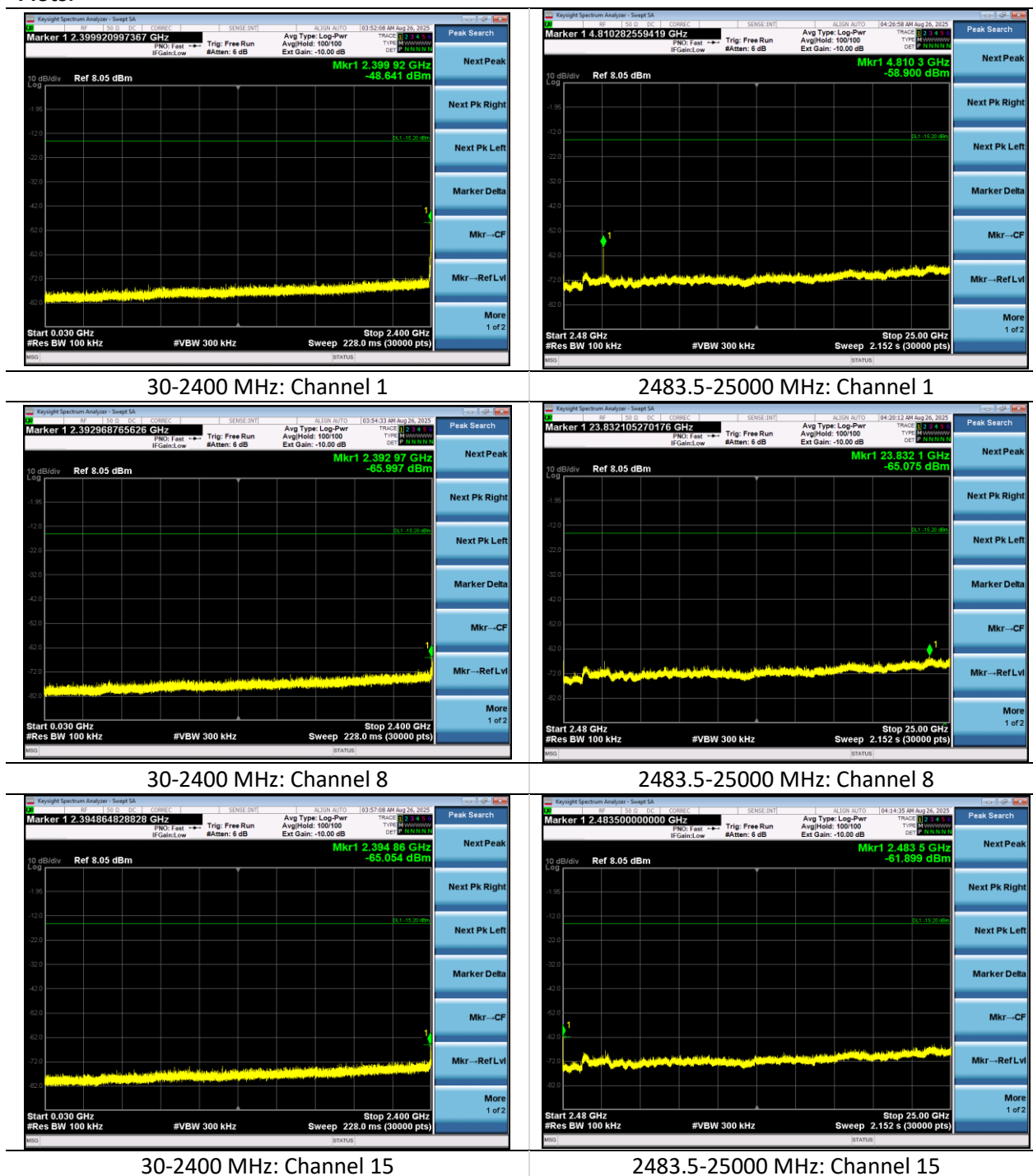
Test Parameters

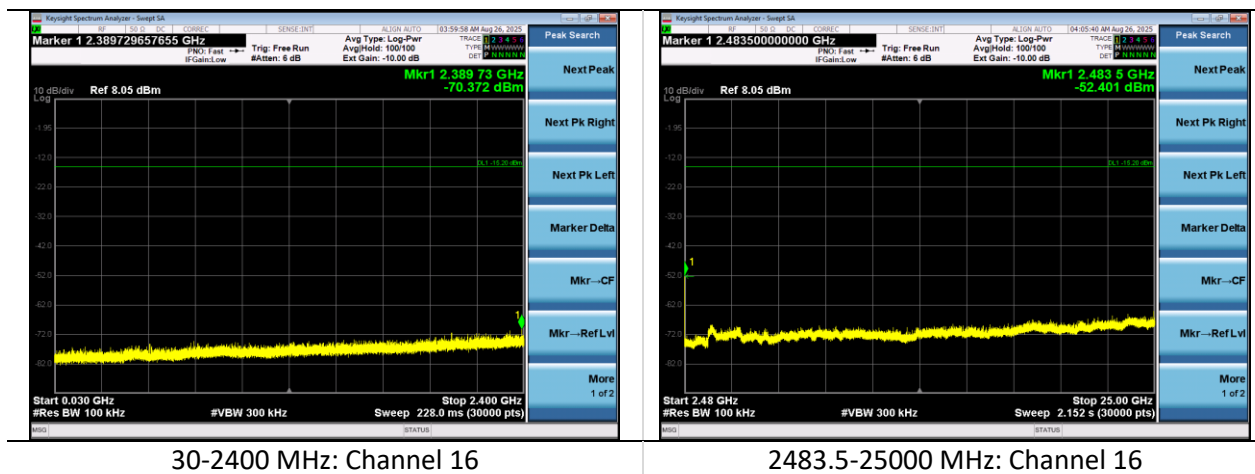
Frequency	30-25000 GHz	Setup	Conducted
RBW	100 kHz	VBW	300 kHz
Detector(s)	Max Peak Hold	Sweep Time	Auto
Limit Calculation	Reference Level (dBm) - 20 dBm = Limit (dBm)		

Data Table:

Channel	Frequency (MHz)	Meas. (dBm)	Limit (dBm)	Margin (dBm)
1	2399.9	-48.6	-15.2	33.4
1	4810.3	-58.9	-15.2	43.7
8	2393.0	-66.0	-15.2	50.8
8	23832.1	-65.1	-15.2	49.9
15	2394.9	-65.1	-15.2	49.8
15	2483.5	-61.9	-15.2	46.7
16	2389.7	-70.4	-15.2	55.2
16	2483.5	-52.4	-15.2	37.2

Plots:





5.2 Radiated Emissions

Description of Measurement	The frequency spectrum is investigated for intentional and / or unintentional signals emanating from the EUT by use of a standardized test site and measurement antenna. The antenna, cable, pre-amp, and other necessary measurement system correction factors are loaded onto the EMI receiver / spectrum analyzer when the measurements are performed allowing the data to be gathered and reported as corrected values. The maximum emissions from the EUT are determined by turn-table azimuth rotation (360°) and scanning of the measurement antenna. Maximized levels are noted at degree values of azimuth, measurement antenna height, and measurement antenna polarity.
Example Calculations	Measurement (dBμV) + Cable factor (dB) + Other (dB) + Antenna Factor (dB/m) = Corrected Reading (dBμV/m) Margin (dB) = Limit (dBμV/m) - Corrected Reading (dBμV/m) Example at 4000 MHz: Reading = 40 dBμV + 3.4 dB + 0.9 dB + 6.5 dB/m = 50.8 dBμV/m Average Limit = 20 log (500) = 54 dBμV/m Margin = 54 dBμV/m - 50.8 dBμV/m = 3.2 dB

Block Diagram



5.2.1 Radiated Emissions

Operator	Mitchell Freund	QA	Jon Dilley
Temperature	24.3°C	R.H. %	46.80%
Test Date	8/27/2025	Location	Chamber 3
Requirement	FCC-247	Method	ANSI C63.10

Limits:

Frequency (MHz)	Quasi Peak Limit (dBuV/m)	Average Limit (dBuV/m)	Peak Limit (dBuV/m)
30-88	40.0	-	-
88-216	43.5	-	-
216-960	46.0	-	-
960-1000	54.0	-	-
1000-25000	-	54.0	74.0

Test Parameters

Frequency	30-25000 MHz	Distance	3 Meters
Detector(s)	Peak, Avg, QP	Table height	80 cm below 1 GHz 150 cm above 1 GHz
RBW	1 MHz Above 1 GHz 120 kHz Below 1 GHz	VBW	3 MHz Above 1 GHz 1.2 MHz Below 1 GHz 300 Hz for Average
Example Calculations	Minimum Average VBW = 1/Transmitter on Time $1/0.003465 = 289$ Hz Minimum Average VBW		

EUT Parameters

Input Power	3.3 VDC	Mode	802.15.4 Tx
Channels	1, 8, 15, 16	Power Settings	14 for Channels 1,8,15 5 for Channel 16

Instrumentation

Asset#	Description	Manufacturer	Model#	Serial#	Date	Due Date	Status
LSC-300	Cable	Chamber 3 Emissions	-	-	1/24/2025	1/24/2026	Active Verification
EE 960203	Analyzer - EMI Receiver	Keysight	N9038A	MY56400072	4/2/2025	4/2/2026	Active Calibration
AA 960163	Antenna - Log Periodic	A.H. Systems, Inc.	SAS-512-2	500	12/11/2024	12/11/2025	Active Calibration
AA 960150	Antenna - Biconical	ETS Lindgren	3110B	0003-3346	12/9/2024	12/9/2025	Active Calibration
AA 960209	Antenna - Low Noise Amplifier	Mini-Circuits	ZVA-213X-S+	037101808	11/19/2024	11/19/2025	Active Calibration
LSC-548	Cable	A.H. Systems, Inc.	SAC-26G-6	548	1/28/2025	1/28/2026	Active Verification
AA 960007	Antenna - Double Ridge Horn	EMCO	3115	9311-4138	11/19/2024	11/19/2025	Active Calibration
AA 960174	Antenna - Small Horn	ETS Lindgren	3116C-PA	00206880	12/2/2024	12/2/2025	Active Calibration

Table:

Under 1 GHz

Frequency (MHz)	Antenna Polarity	Height (cm)	Azimuth (degree)	Quasi-Peak Reading (dBμV/m)	Quasi-Peak Limit (dBμV/m)	Quasi-Peak Margin (dB)	Note
974.5	H	200	0	37.4	54.0	16.6	Ch 8, X Orien
901.7	V	180	0	33.8	46.0	12.2	Ch 8, X Orien
984.4	V	140	0	34.2	54.0	19.8	Ch 8, Y Orien
912.6	H	200	0	33.7	46.0	12.3	Ch 8, Y Orien
943.1	H	105	0	33.6	46.0	12.4	Ch 8, Z Orien
996.5	V	100	0	34.3	54.0	19.7	Ch 8, Z Orien
81.5	V	295	112	27.6	40.0	12.4	Ch 8, Z Orien
80.5	H	300	137	27.4	40.0	12.6	Ch 8, Z Orien
81.5	H	190	360	30.8	40.0	9.3	Ch 8, Y Orien
81.5	V	200	178	30.6	40.0	9.5	Ch 8, Y Orien
197.2	V	200	0	32.7	43.5	10.8	Ch8, X Orien

Above 1 GHz Tables

Peak Band edge Emissions

Frequency (MHz)	Antenna Polarity	Height (cm)	Azimuth (degree)	Peak Reading (dBμV/m)	Peak Limit (dBμV/m)	Peak Margin (dB)	Note
2483.6	H	150	103	50.5	74.0	23.5	Ch 16, Z Orien
2483.5	V	160	113	51.6	74.0	22.4	Ch 16, Y Orien
2377.9	V	150	88	46.9	74.0	27.1	Ch 1, Y Orien
2349.6	H	150	87	46.9	74.0	27.1	Ch 1, Z Orien
2485.1	H	173	143	48.3	74.0	25.7	Ch 15, X Orien
2485.8	V	150	86	48.5	74.0	25.5	Ch 15, Y Orien

Average Band Edge Emissions

Frequency (MHz)	Antenna Polarity	Height (cm)	Azimuth (degree)	Average Reading (dBμV/m)	Average Limit (dBμV/m)	Average Margin (dB)	Note
2483.5	H	150	103	41.7	54.0	12.3	Ch 16, Z Orien
2483.5	V	160	113	43.1	54.0	10.9	Ch 16, Y Orien
2390.0	V	150	88	35.3	54.0	18.7	Ch 1, Y Orien
2390.0	H	150	87	35.2	54.0	18.8	Ch 1, Z Orien
2483.5	H	173	143	36.9	54.0	17.1	Ch 15, X Orien
2483.5	V	150	86	37.6	54.0	16.4	Ch 15, Y Orien

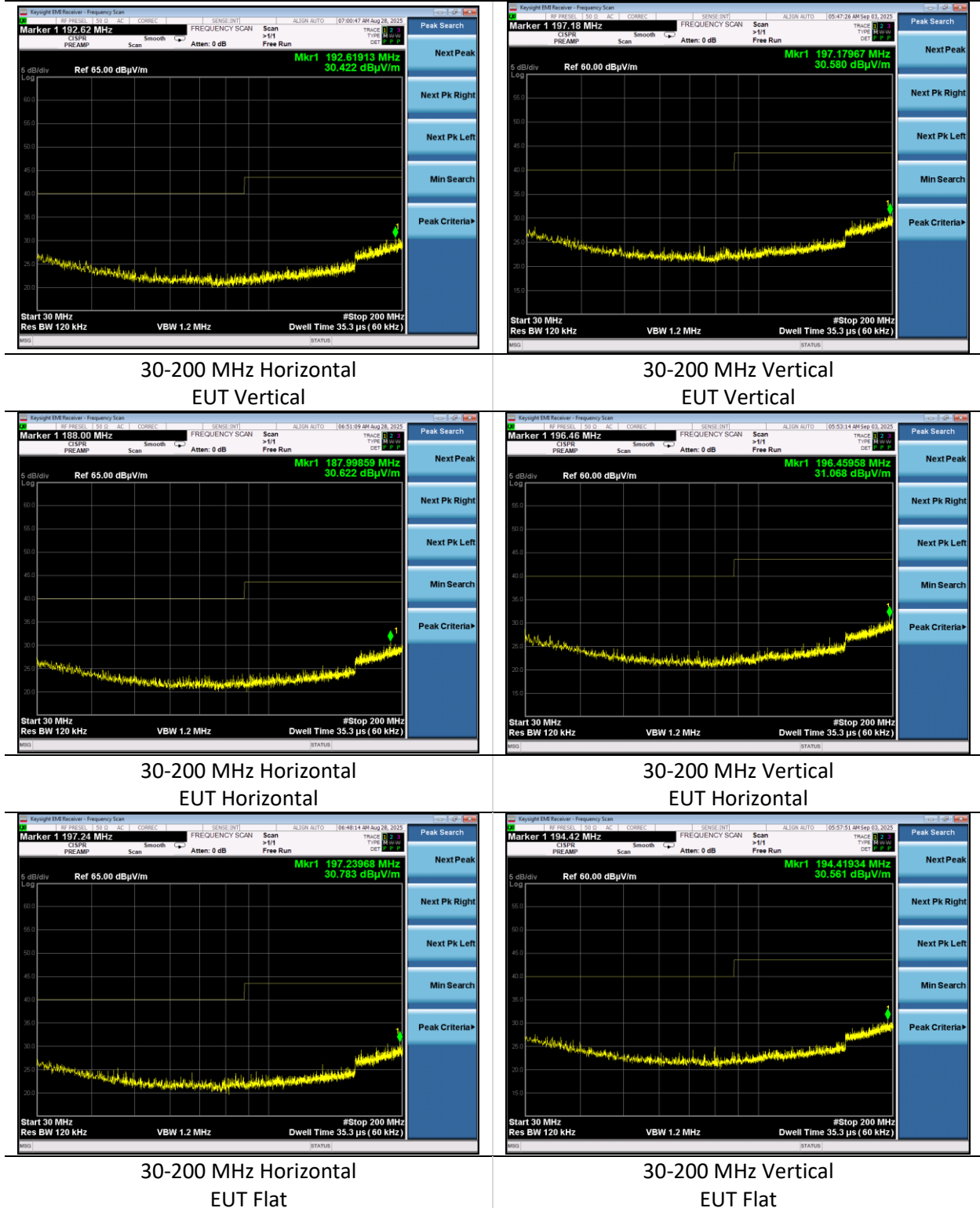
Peak Spurious Emissions

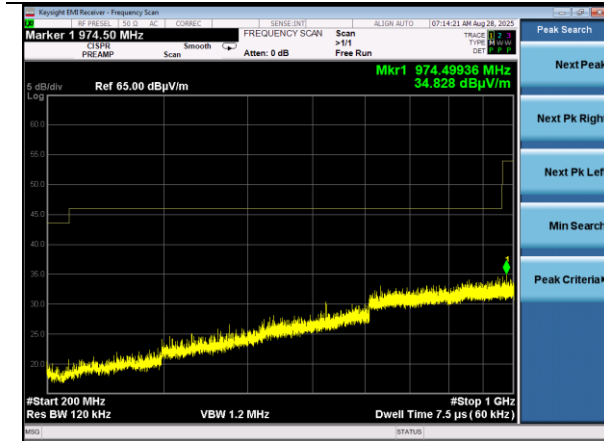
Frequency (MHz)	Antenna Polarity	Height (cm)	Azimuth (degree)	Peak Reading (dBμV/m)	Peak Limit (dBμV/m)	Peak Margin (dB)	Note
17792.3	V	150	0	49.4	74.0	24.6	Chan 8, Y Orien
17871.7	H	164	100	49.2	74.0	24.8	Chan 8, Y Orien
17854.4	H	197	263	49.5	74.0	24.5	Chan 8, X Orien
17814.7	V	150	114	49.3	74.0	24.7	Chan 8, X Orien
17856.7	V	201	58	49.3	74.0	24.7	Chan 8, Z Orien
17854.9	H	158	246	49.8	74.0	24.2	Chan 8, Z Orien
4881.1	V	170	139	37.9	74.0	36.1	Chan 8, Z Orien
4878.8	H	173	98	38.5	74.0	35.5	Chan 8, Z Orien
7321.4	H	150	80	43.3	74.0	33.4	Chan 8, Z Orien
7318.4	V	167	110	44.1	74.0	30.8	Chan 8, Z Orien
21130.0	V	188	219	45.1	74.0	28.9	Chan 8, X Orien
22814.3	H	194	252	44.8	74.0	29.2	Chan 8, X Orien

Average Spurious Emissions

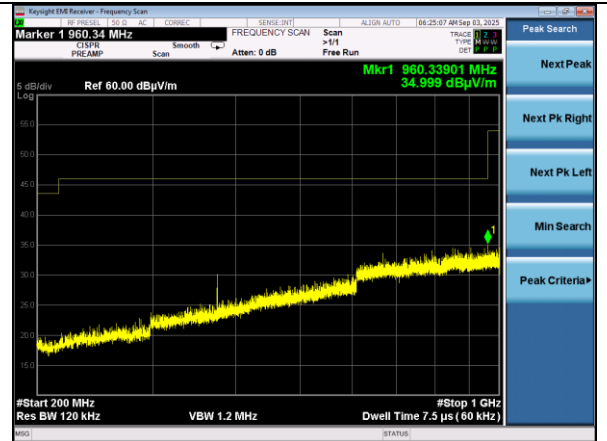
Frequency (MHz)	Antenna Polarity	Height (cm)	Azimuth (degree)	Average Reading (dBμV/m)	Average Limit (dBμV/m)	Average Margin (dB)	Note
17792.4	V	150	0	44.9	54.0	9.1	Chan 8, Y Orien
17871.9	H	164	100	40.9	54.0	13.1	Chan 8, Y Orien
17852.6	H	197	263	41.3	54.0	12.7	Chan 8, X Orien
17815.0	V	150	114	41.1	54.0	12.9	Chan 8, X Orien
17856.8	V	201	58	40.8	54.0	13.2	Chan 8, Z Orien
17854.3	H	158	246	41.8	54.0	12.2	Chan 8, Z Orien
4889.7	V	170	139	36.1	54.0	17.9	Chan 8, Z Orien
4879.1	H	173	98	35.0	54.0	19.1	Chan 8, Z Orien
7318.4	H	150	80	40.6	54.0	10.7	Chan 8, Z Orien
7320.9	V	167	110	43.2	54.0	9.9	Chan 8, Z Orien
21150.3	V	188	219	38.2	54.0	15.8	Chan 8, X Orien
21183.2	H	194	252	37.8	54.0	16.2	Chan 8, X Orien

Plots:

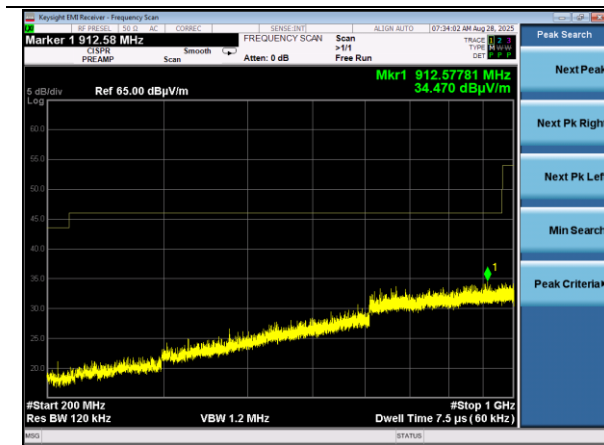




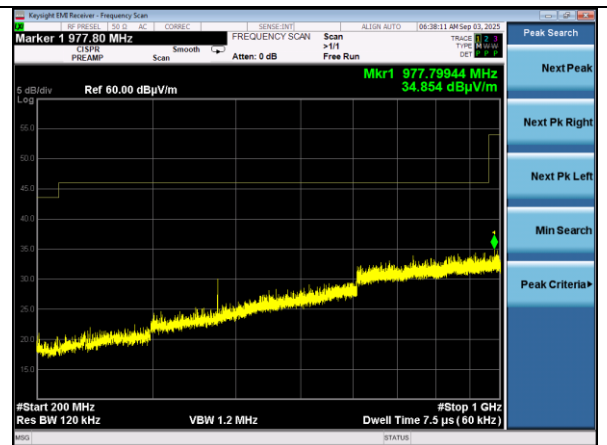
200-1000 MHz Horizontal
EUT Vertical



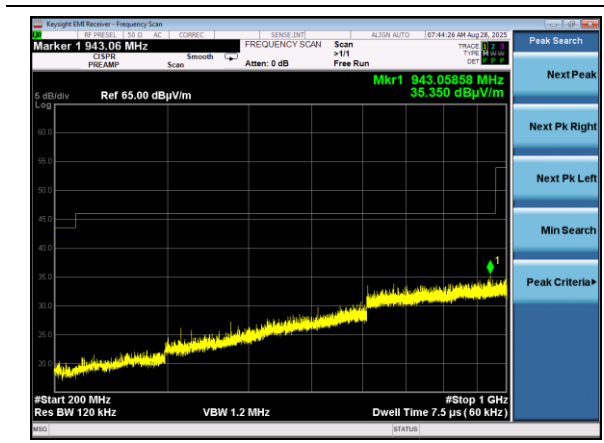
200-1000 MHz Vertical
EUT Vertical



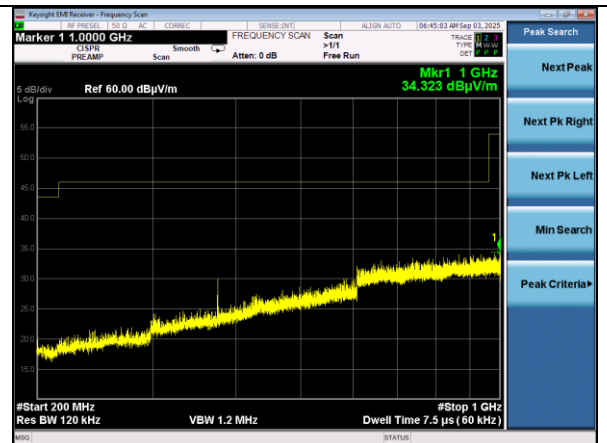
200-1000 MHz Horizontal
EUT Horizontal



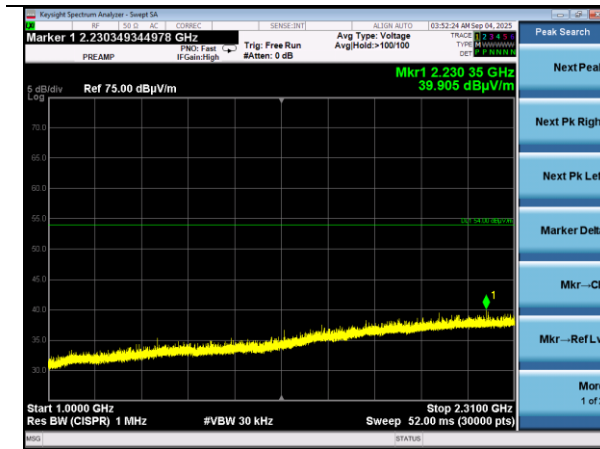
200-1000 MHz Vertical
EUT Horizontal



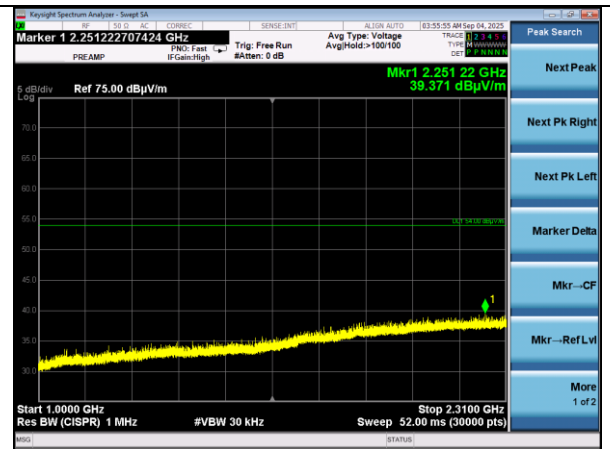
200-1000 MHz Horizontal
EUT Flat



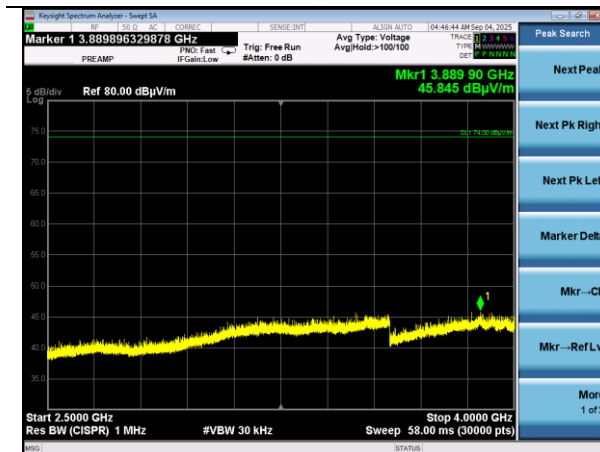
200-1000 MHz Vertical
EUT Flat



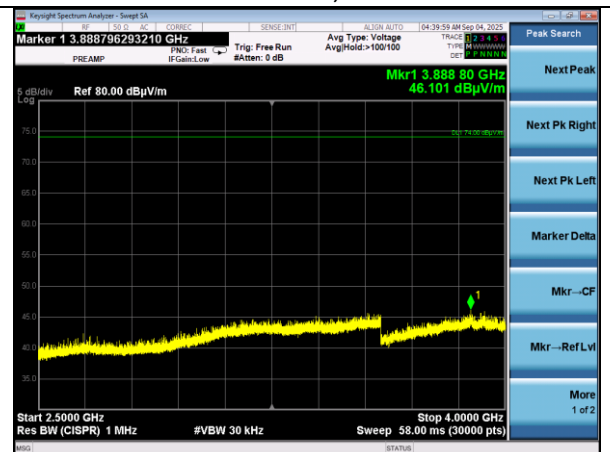
1-2.31 GHz Horizontal
EUT Flat, Tx Mid



1-2.31 GHz Vertical
EUT Vertical, Tx Mid



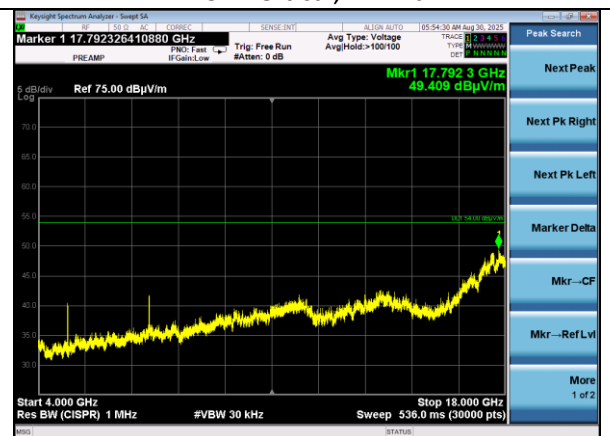
2.5-4 GHz Horizontal
EUT Flat, Tx Mid



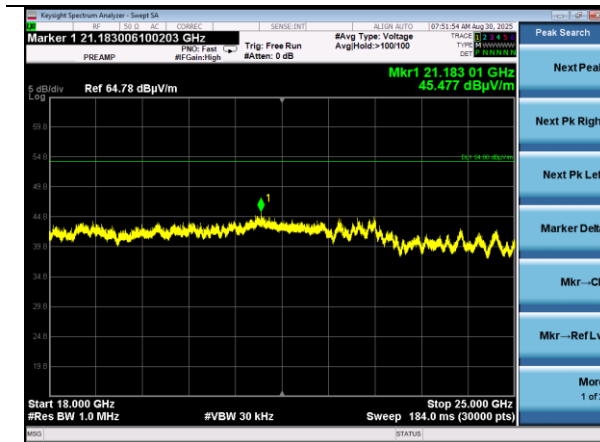
2.5-4 GHz Vertical
EUT Vertical, Tx Mid



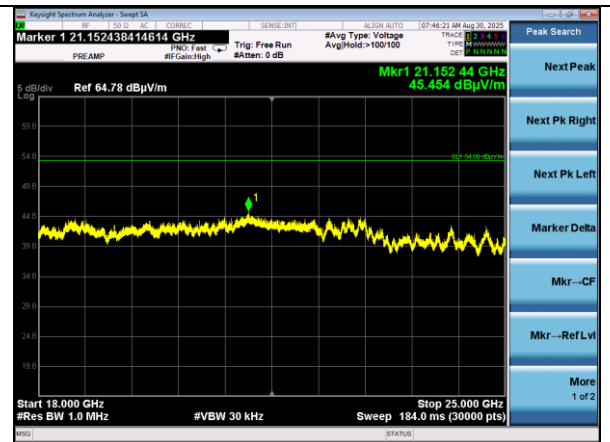
4-18 GHz Horizontal
EUT Vertical, Tx Mid



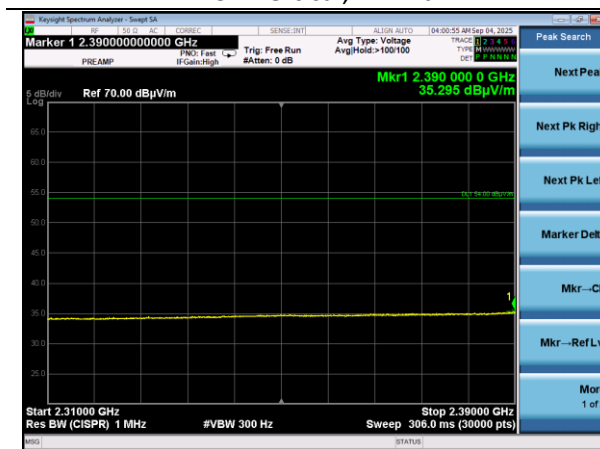
4-18 GHz Vertical
EUT Vertical, Tx Mid



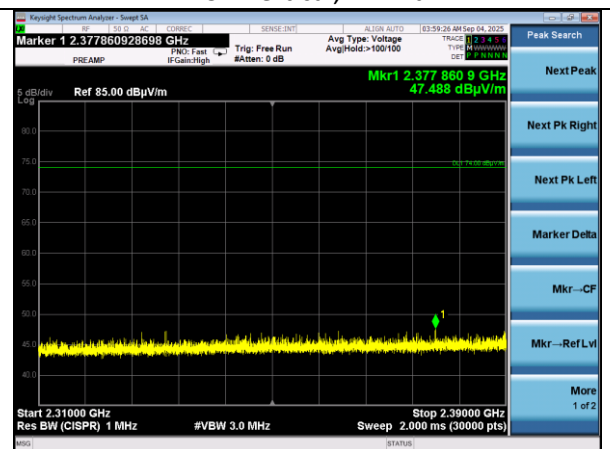
18-25 GHz Horizontal
EUT Vertical, Tx Mid



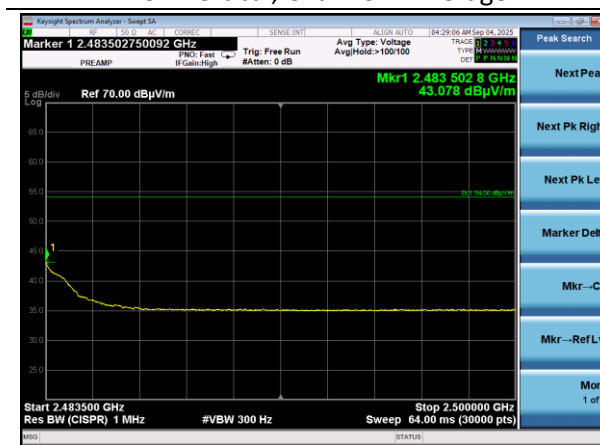
18-25 GHz Vertical
EUT Vertical, Tx Mid



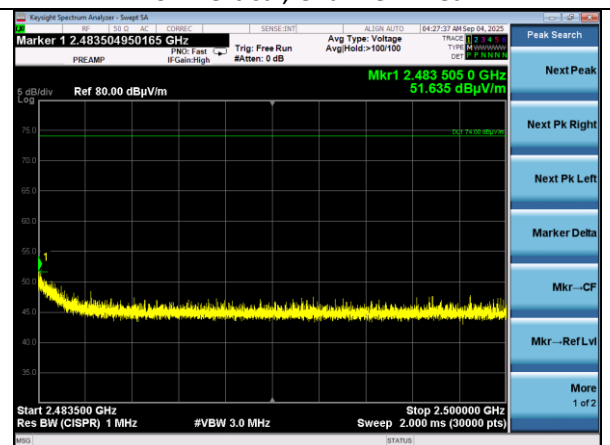
2.31-2.39 GHz Vertical
EUT Vertical, Channel 1 Average



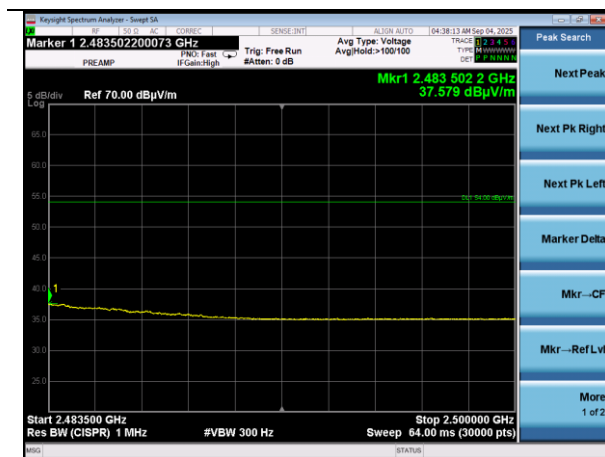
2.31-2.39 GHz Vertical
EUT Vertical, Channel 1 Peak



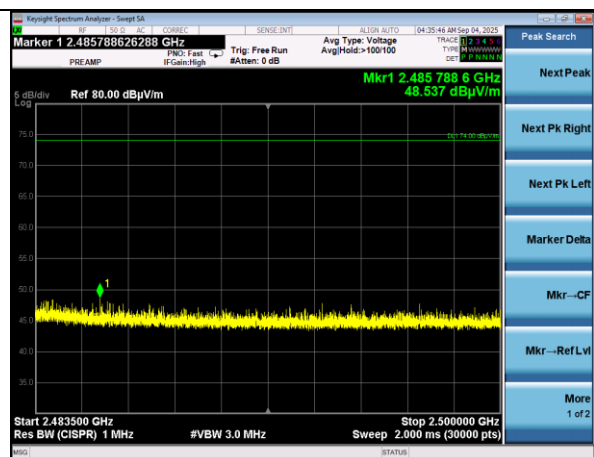
2.4835-2.5 GHz Vertical
EUT Vertical, Channel 15 Average



2.4835-2.5 GHz Vertical
EUT Vertical, Channel 15 Peak



2.4835-2.5 GHz Vertical
EUT Vertical, Channel 16 Average



2.4835-2.5 GHz Vertical
EUT Vertical, Channel 16 Peak

6 REVISION HISTORY

Version	Date	Notes	Person
0.0	9/4/2025	Initial Draft	Mitchell Freund
1.0	9/15/2025	Revised Draft	Mitchell Freund
2.0	10/7/2025	ACB Comments Addressed	Mitchell Freund

END OF REPORT