



FCC PART 15, SUBPART C ISED C RSS-247, ISSUE 4, JULY 2025

TEST REPORT

For

ChargePoint, Inc.

253 E. Hacienda Ave.,
Campbell, CA, 95008, USA

FCC ID: W38-LB2AE
IC: 8854A-LB2AE

Report Type: Class II Permissive Change	Product Type: WLAN + Bluetooth Module
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* This report may contain data that are not covered by the A2LA accreditation and are marked with an asterisk "*" (Rev.2)

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DOCUMENT REVISION HISTORY

Revision Number	Report Number	Description of Revision	Date of Revision
0	R2603312-DSS	Class II Permissive Change	2026-06-19

1 General Description

1.1 Product Description for Equipment Under Test (EUT)

This test report is prepared on behalf of *ChargePoint, Inc.*, and their product model: LB2AE, FCC ID: W38-LB2AE, IC: 8854A-LB2AE, the “EUT” as referred to in this report. The EUT is a radio module with Bluetooth and 2.4/5 GHz Wi-Fi capabilities.

Note: EUT module was installed within a large enclosure that also contains other radio modules. For this application, these other radios are not activated.

BACL assigned serial number: R2603312-01.

Model Number	LB2AE
FCC ID	W38-LB2AE
IC	8854A-LB2AE
HVIN	LB2AE
Packet Type	DH5/2DH5/3DH5
Channel Spacing	1 MHz
Antenna Gain	4.0 dBi

1.2 Objective

This report was prepared on behalf of *ChargePoint, Inc.*, in accordance with Part 2, Subpart J, and Part 15, Subparts B and C of the Federal Communication Commission’s rules and ISEDC RSS-247 Issue 4, July 2025.

The objective was to determine compliance with FCC Part 15.247 and ISEDC RSS-247 rules for Output Power, Antenna Requirements, and Radiated Spurious Emissions.

In order to determine compliance, the manufacturer or a contracted laboratory makes measurements and takes the necessary steps to ensure that the equipment complies with the appropriate technical standards.

Maintenance of compliance is the responsibility of the manufacturer. Any modification of the product may be which result in lowering the immunity should be checked to ensure compliance has been maintained (i.e., printed circuit board layout changes, different line filter, different power supply, harnessing and/or I/O cable changes, etc.).

1.3 Related Submittal(s)/Grant(s)

FCC Part 15, Subpart C, Equipment DTS with FCC ID: W38-LB2AE, IC: 8854A-LB2AE.

FCC Part 15, Subpart E, Equipment NII with FCC ID: W38-LB2AE, IC: 8854A-LB2AE.

1.4 Test Methodology

All measurements contained in this report were conducted in accordance with ANSI C63.10-2020+Cor. 1-2023+C63.10a-2024 + Errata to C63.10a-2024, American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices.

1.5 Measurement Uncertainty

All measurements involve certain levels of uncertainties, especially in the field of EMC. The factors contributing to uncertainties are spectrum analyzer, cable loss, antenna factor calibration, antenna directivity, antenna factor variation with height, antenna phase center variation, antenna factor frequency interpolation, measurement distance variation, site imperfections, mismatch (average), and system repeatability.

Parameter	Measurement uncertainty
Occupied Channel Bandwidth	±5%
RF output power, conducted	±0.57 dB
Power Spectral Density, conducted	±1.48 dB
Unwanted Emissions, conducted	±1.57 dB
All emissions, radiated	±4.0 dB
AC power line Conducted Emission	±2.0 dB
Temperature	±2°C
Humidity	±5%
DC and low frequency voltages	±1.0%
Time	±2%
Duty Cycle	±3%

1.6 Test Facility Registrations

BACLs test facilities that are used to perform Radiated and Conducted Emissions tests are currently recognized by the Federal Communications Commission as Accredited with NIST Designation Number US1129.

BACL's test facilities that are used to perform Radiated and Conducted Emissions tests are currently registered with Industry Canada under Registration Numbers: 3062A.

BACL is a Chinese Taipei Bureau of Standards Metrology and Inspection (BSMI) validated Conformity Assessment Body (CAB), under Appendix B, Phase I Procedures of the APEC Mutual Recognition Arrangement (MRA). BACL's BSMI Lab Code Number is: SL2-IN-E-1002R

BACL's test facilities that are used to perform AC Line Conducted Emissions, Telecommunications Line Conducted Emissions, Radiated Emissions from 30 MHz to 1 GHz, and Radiated Emissions from 1 GHz to 6 GHz are currently recognized as Accredited in accordance with the Voluntary Control Council for Interference [VCCI] Article 15 procedures under Registration Number A-0428.

1.7 Test Facility Accreditations

Bay Area Compliance Laboratories Corp. (BACL) is:

A- An independent, 3rd-Party, Commercial Test Laboratory accredited to ISO/IEC 17025:2017 by A2LA (Test Laboratory Accreditation Certificate Number 3297.02), in the fields of: Electromagnetic Compatibility and Telecommunications. Unless noted by an Asterisk (*) in the Compliance Matrix (See Section 3 of this Test Report), BACL's ISO/IEC 17025:2017 Scope of Accreditation includes all of the Test Method Standards and/or the Product Family Standards detailed in this Test Report..

BACL's ISO/IEC 17025:2017 Scope of Accreditation includes a comprehensive suite of EMC Emissions, EMC Immunity, Radio/Wireless, RF Exposure, Safety, and Wireline Telecommunications test methods applicable to a wide range of product categories. These product categories include, but are not limited to: Central Office Telecommunications Equipment [including NEBS – Network Equipment Building Systems], Information Technology Equipment (ITE); Telecommunications Terminal Equipment (TTE); Medical Electrical Equipment; Industrial, Scientific and Medical Test Equipment; Professional Audio and Video Equipment; Industrial Equipment, Scientific Instruments and Laboratory Apparatus; Cable Distribution Systems, Railway Equipment, Marine Equipment, and Energy Efficient Lighting. Additionally, BACL offers comprehensive test capabilities for both Unlicensed and Licensed Wireless and RF Devices, per the requirements of the FCC (USA), ISED Canada (Canada), the EU/EEA/EFTA Nations (per the ETSI Standards applicable under the Radio Equipment Directive), Singapore, MIC (Japan), South Korea, Vietnam, and Taiwan ROC.

B- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.03) to certify

- For the USA (Federal Communications Commission):

- 1- All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
- 2- All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
- 3- All Telephone Terminal Equipment within FCC Scope C.

- For the Canada (Innovation, Science and Economic Development Canada):

- 1 All Scope 1-Licence-Exempt Radio Frequency Devices;
- 2 All Scope 2-Licensed Personal Mobile Radio Services;
- 3 All Scope 3-Licensed General Mobile & Fixed Radio Services;
- 4 All Scope 4-Licensed Maritime & Aviation Radio Services;
- 5 All Scope 5-Licensed Fixed Microwave Radio Services
- 6 All Broadcasting Equipment Technical Standards (BETS) in the Category I Equipment Standards List.
7. RSS-HAC Radio Scope 6 Hearing Aid Compatibility and Volume Control

- For Singapore (Info-Comm Media Development Authority (IMDA)):

- 1 All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2 IMDA Phase I
2. All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2 IMDA Phase II

- For the Hong Kong Special Administrative Region & (Office of the Communications Authority-OFCA) – APEC Tel MRA- Phase I and Phase II:

- 1 Radio Equipment, per KHCA 10XX-series Specifications; HKCA 1001, 1002, 1003, 1004, 1005, 1006, 1007, 1008, 1010, 1015, 1016, 1019, 1020, 1022, 1026, 1033, 1034, 1035, 1036, 1037, 1039, 1041, 1042, 1043, 1044, 1045, 1046, 1047, 1048, 1049, 1050, 1052, 1053, 1054, 1056, 1057, 1061, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1080, 1081

- 2 GMDSS Marine Radio Equipment, per HKCA 12XX-series Specifications; HKCA 1218, 1223, 1224, 1225, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1277, 1281, 1282, 1283
- 3 Fixed Network Equipment, per HKCA 20XX-series Specifications; HKCA 2001, 2011, 2014, 2015, 2017, 2026, 2027, 2028, 2029, 2030, 2031

- For Japan:

- 1 MIC Telecommunication Business Law (Terminal Equipment):
 - All Scope A1 - Terminal Equipment for the Purpose of Calls;
 - All Scope A2 - Other Terminal Equipment
- 2 Radio Law (Radio Equipment):
 - All Scope B1 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
 - All Scope B2 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
 - All Scope B3 - Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law

C- A Product Certification Body accredited to ISO/IEC 17065:2012 by A2LA (Product Certification Body Accreditation Certificate Number 3297.01) to certify Products to USA's Environmental Protection Agency (EPA) ENERGY STAR Product Specifications for:

- 1 Appliances:
 - for Clothes Washers (ver. 8.1)
 - for Residential Dishwashers (ver. 6.0)
 - for Residential Refrigerators and/or Freezers (ver. 5.0)
- 2 Commercial Food Service Equipment:
 - for Commercial Dishwashers (ver. 3.0)
 - for Commercial Ice Machines (ver. 3.0)
- 3 Data Center Equipment:
 - for Large Network Equipment (ver. 1.1)
- 4 Electronics and Office Equipment:
 - for Audio/Video Equipment (ver. 3.0)
 - for Computers (ver. 8.0)
 - for Data Center Storage (ver. 2.1)
 - for Displays (ver. 8.0)
 - for Enterprise Servers (ver. 4.0)
 - for Imaging Equipment (ver. 3.1)
 - for Set-top Boxes & Cable Boxes (ver. 5.1)
 - for Small Network Equipment (ver. 1.0)
 - for Telephony (ver. 3.0)
 - for Televisions (ver. 9.0), Title 10 Chapter II CFR Part 430 Subpart B –Appendix BB, Title 10 Chapter II CFR Part 430 Subpart B –Appendix DD
- 3 Lighting and Fans
 - for Decorative Light Strings (ver. 1.5)
 - for Downlights (ver. 1.0)
 - for Lamps (Light Bulbs)(ver. 2.1)
 - for Luminaires (including sub-components) (ver. 2.2)
 - for Residential Ceiling Fans (ver. 4.0)
 - for Residential Ventilating Fans (ver. 4.1)

4 Other

- for Residential Ceiling Fans (ver. 4.0)
- for Electric Vehicle Supply Equipment (ver. 1.2)(Electric Vehicle Supply Equipment Final Test Method for DC-output EVSE Rev March 2021)
- for Water Coolers (ver. 3.0)
- for Smart Home Energy Management Systems (ver. 1.1)

D- A NIST Designated Phase-I and Phase-II Conformity Assessment Body (CAB) for the following economies and regulatory authorities under the terms of the stated MRAs/Treaties:

1. For the USA (Federal Communications Commission), as a Telecommunications Certification Body (TCB):
 - All Unlicensed radio frequency devices within FCC Scopes A1, A2, A3, and A4;
 - All Licensed radio frequency devices within FCC Scopes B1, B2, B3, and B4;
 - All Telephone Terminal Equipment within FCC Scope C.
2. Canada (ISED Canada) Foreign Certification Body – FCB – APEC Tel MRA -Phase I & Phase II:
 - Phase I Designation Letter
 - Phase II ISED Canada recognition as a Product Certification Body for unlicensed wireless devices, licensed radios, radars, etc.:
3. For Singapore (InfoComm Media Development Authority (IMDA)) APEC Tel MRA -Phase I & Phase II:
 - All Line Terminal Equipment: All Technical Specifications for Line Terminal Equipment – Table 1 of IDA MRA Recognition Scheme: 2011, Annex 2 IMDA Phase I
 - All Radio-Communication Equipment: All Technical Specifications for Radio-Communication Equipment – Table 2 of IDA MRA Recognition Scheme: 2011, Annex 2 IMDA Phase II
4. For the Hong Kong Special Administrative Region & (Office of the Communications Authority – OFCA) – APEC Tel MRA -Phase I & Phase II:
 - NIST Phase I Scope Recognition Letter from OFCA for BACL –US0057
 - OFCA Phase II Designation Letter
5. For Japan (Ministry of Communications):
 - NIST Japan Recognition
 - MIC Telecommunication Business Law (Terminal Equipment):
 1. All Scope A1 – Terminal Equipment for the Purpose of Calls;
 2. All Scope A2 – Other Terminal Equipment
 - Radio Law (Radio Equipment):
 1. All Scope B1 – Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 1 of the Radio Law
 2. All Scope B2 – Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 2 of the Radio Law
 3. All Scope B3 – Specified Radio Equipment specified in Article 38-2-2, paragraph 1, item 3 of the Radio Law
 - Japan VCCI – Voluntary Control Council for Interference US-Japan Telecom Treaty (VCCI Side Letter)
 1. VCCI Certificate
 - Japan Registered Certification Body
 1. RCB Recognition Letter

6. European Union:
 - Radio Equipment Directive [RED] 2014/53/EU US-EU EMC & Telecom MRA CAB (NB)
 - EMC Directive [EMCD] 2014/30/EU US-EU EMC & Telecom MRA CAB (NB):
7. Australia ACMA (Australian Communication and Media Authority) – APEC Tel MRA -Phase I:
 - Phase I Designation Letter
8. Chinese Taipei (Republic of China – Taiwan):
 - NCC (National Communications Commission) APEC Tel MRA -Phase I
9. Republic of Korea (Ministry of Communications – Radio Research Laboratory) APEC Tel MRA -Phase I:
 - NIST Phase I Scope Update Notification Letter from Korea for BACL
10. Vietnam APEC Tel MRA -Phase I (page 13)
 - Vietnam (MIC) NIST Phase I Scope
11. Indonesia SDPPI (page 6)
 - Phase I Listing
12. Israel Phase I
 - NIST Phase I Scope Update Recognition Letter from Israel for BACL –US0057
13. UK Radio and EMC NIST Designation Letters
 - UK website: <https://www.gov.uk/uk-market-conformity-assessment-bodies/bay-area-compliance-laboratories-corp-bacl>
 1. Electromagnetic Compatibility Regulations (SI 2016/1091)
https://assets.publishing.service.gov.uk/media/5fe1e344e90e07452fce4e5a/AB_1313_BACL_UK EMC_Regs_NIST_Designation_Extended.pdf
 2. Radio Equipment Regulations 2017 (SI 2017/1206)
https://assets.publishing.service.gov.uk/media/5fe1e351e90e074525bf7be6/AB_1313_BACL_UK_Radio_Regs_NIST_Designation_Extended.pdf
14. IFT Mexico Phase I
 - NIST Phase I New Recognition Letter from Mexico for BACL – US0057
15. Taiwan (BSMI) Phase 1 Designation Letter and designation form.
 - NIST Phase I Scope Update Designation Letter to BSMI for BACL – US0057
 - NIST Phase I Scope Update Designation Form to BSMI for BACL – US0057

2 System Test Configuration

2.1 Justification

The EUT was configured for testing in accordance to ANSI C63.10-2020+Cor. 1-2023+C63.10a-2024 + Errata to C63.10a-2024.

The EUT was tested in a testing mode to represent worst-case results during the final qualification test.

2.2 EUT Exercise Software

The exercising software used during testing was “Tera Term”. The software is compliant with the standard requirements being tested against.

Radio	Mode	Channel	Frequency (MHz)	Power Setting
Bluetooth	DH5	Low	2402	Default
		Middle	2442	Default
		High	2480	Default
	2DH5	Low	2402	Default
		Middle	2442	Default
		High	2480	Default
	3DH5	Low	2402	Default
		Middle	2442	Default
		High	2480	Default

Data rates used:

DH5: 1Mbps

2DH5: 2Mbps

3DH5: 3Mbps

2.3 Equipment Modifications

No modifications were made to the EUT during testing.

2.4 Local Support Equipment

Manufacturer	Description	Model	Serial Number
Dell	Laptop	Latitude E7440	GCP3P

2.5 Remote Support Equipment

Manufacturer	Description	Model
ChargePoint, Inc.	Universal Controller Board	-

2.6 Power Supply and Line Filters

Manufacturer	Description	Model	Serial Number
OpenPeak	5VDC 4A Wall Adapter Switching Power Supply	LFS054000D-A8S	EPS050400H-PSRP-FL

2.7 Interface Ports and Cabling

Cable Description	Length (m)	To	From
USB-A to USB Micro B	1.5	Universal Controller Board	Laptop
USB-C to USB-C	< 1	Universal Controller Board	EUT

3 Summary of Test Results

FCC and ISED Rules	Description of Test	Results
FCC §15.203 ISED RSS-Gen §6.8	Antenna Requirement	Compliant
FCC §2.1091, §15.247(i) ISED RSS-102	RF Exposure	Compliant
FCC §2.1053, §15.205, §15.209, §15.247(d) ISED RSS-247 §6.6 ISED RSS-Gen §8.9, §8.10	Radiated Spurious Emissions	Compliant

BACL is responsible for all the information provided in this report, except when information is provided by the customer as identified in this report. Information provided by the customer, e.g., antenna gain, can affect the validity of results.

4 FCC §15.203 & ISEDC RSS-Gen §6.8 - Antenna Requirements

4.1 Applicable Standards

According to FCC §15.203:

An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this Section. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited.

And according to FCC §15.247 (b) (4), if transmitting antennas of directional gain greater than 6 dBi are used the power shall be reduced by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

According to ISEDC RSS-Gen §6.8: Transmitter Antenna

The applicant for equipment certification shall provide a list of all antenna types that may be used with the transmitter, where applicable (i.e. for transmitters with detachable antenna), indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna. The test report shall demonstrate the compliance of the transmitter with the limit for maximum equivalent isotropically radiated power (e.i.r.p.) specified in the applicable RSS, when the transmitter is equipped with any antenna type, selected from this list.

For expediting the testing, measurements may be performed using only the antenna with highest gain of each combination of transmitter and antenna type, with the transmitter output power set at the maximum level. However, the transmitter shall comply with the applicable requirements under all operational conditions and when in combination with any type of antenna from the list provided in the test report (and in the notice to be included in the user manual, provided below).

When measurements at the antenna port are used to determine the RF output power, the effective gain of the device's antenna shall be stated, based on a measurement or on data from the antenna's manufacturer.

The test report shall state the RF power, output power setting and spurious emission measurements with each antenna type that is used with the transmitter being tested.

For license-exempt equipment with detachable antennas, the user manual shall also contain the following notice in a conspicuous location:

This radio transmitter [enter the device's ISED certification number] has been approved by Innovation, Science and Economic Development Canada to operate with the antenna types listed below, with the maximum permissible gain indicated. Antenna types not included in this list that have a gain greater than the maximum gain indicated for any type listed are strictly prohibited for use with this device.

Immediately following the above notice, the manufacturer shall provide a list of all antenna types which can be used with the transmitter, indicating the maximum permissible antenna gain (in dBi) and the required impedance for each antenna type.

4.2 Antenna Description

The antennas used by the EUT are permanent attached antennas.

External/Internal/ Integral	Part Number	Antenna Type	Frequency Range (MHz)	Maximum Antenna Gain (dBi)
Integral	12-004201-03	PIFA	2400-2500	4.0

5 FCC §2.1091, §15.247(i) & ISEDC RSS-102 - RF Exposure

5.1 Applicable Standards

According to FCC §15.247(i) and §1.1307(b)(1), systems operating under the provisions of this section shall be operated in a manner that ensures that the public is not exposed to radio frequency energy level in excess of the Commission's guidelines.

According to KDB 447 498 Section (7.2), "simultaneous transmission of MPE test exclusion applies when the sum of the MPE ratios for all simultaneous transmitting antennas incorporated in a host device, based on calculated or measured field strengths or power density, is ≤ 1.0 . The MPE ratio of each antenna is determined at the minimum *test separation distance* required by the operating configurations and exposure conditions of the host device, according to the ratio of field strengths or power density to MPE limit, at the test frequency.

Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Averaging Time (minutes)
Limits for General Population/Uncontrolled Exposure				
0.3-1.34	614	1.63	* (100)	30
1.34-30	824/f	2.19/f	* (180/f ²)	30
30-300	27.5	0.073	0.2	30
300-1500	/	/	f/1500	30
1500-100,000	/	/	1.0	30

Where: f = frequency in MHz

* = Plane-wave equivalent power density

Before equipment certification is granted, the procedure of IC RSS-102 must be followed concerning the exposure of humans to RF field.

According to ISED RSS-102 Issue 6:

6.6 Field reference level exposure exemption limits

Field reference level (FRL) exposure evaluation is required if the separation distance between the user and/or bystander and the device's radiating element is greater than 20 cm (i.e. mobile devices), except when the device operates as follows:

- below 20 MHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than 1 W (adjusted for tune-up tolerance)
- at or above 20 MHz and below 48 MHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than $4.49/f^{0.5} W$ (adjusted for tune-up tolerance), where f is in MHz
- at or above 48 MHz and below 300 MHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than 0.6 W (adjusted for tune-up tolerance)
- at or above 300 MHz and below 6 GHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than $1.31 \times 10^{-2} f^{0.6834} W$ (adjusted for tune-up tolerance), where f is in MHz
- at or above 6 GHz and the source-based, time-averaged maximum EIRP of the device is equal to or less than 5 W (adjusted for tune-up tolerance)

In these cases, the information contained in the RF exposure technical brief may be limited to information that demonstrates how the EIRP was derived.

5.2 MPE Prediction

Predication of MPE limit at a given distance, Equation from OET Bulletin 65, Edition 97-01

$$S = PG/4\pi R^2$$

Where: S = power density

P = power input to antenna

G = power gain of the antenna in the direction of interest relative to an isotropic radiator

R = distance to the center of radiation of the antenna

5.3 MPE Results

Band	Frequency (MHz)	Antenna Gain (dBi)	Maximum Power (dBm)	Maximum EIRP (dBm)	Maximum EIRP (mW)	Power Density at 20cm (mW/cm ²)	Limit (mW/cm ²)
BT Classic	2402	4.0	7.0	11.0	12.59	0.0025	1.0

5.4 IC Exemption

BT Classic

The EIRP of this device is 11.0 dBm (12.59 mW) which is less than the exemption threshold, i.e., $1.31 \times 10^{-2} \times f^{(0.6834)} = 2.67 \text{ W}$. Therefore, the RF exposure evaluation is exempt.

Therefore the RF exposure Evaluation is not required.

6 FCC §15.35(b), § 15.205, §15.209, §15.247(d) & ISEDC RSS-247 §6.6, RSS-Gen §8.9, §8.10 - Spurious Radiated Emissions

6.1 Applicable Standards

As per FCC §15.35(d): Unless otherwise specified, on any frequency or frequencies above 1000 MHz, the radiated emission limits are based on the use of measurement instrumentation employing an average detector function. Unless otherwise specified, measurements above 1000 MHz shall be performed using a minimum resolution bandwidth of 1 MHz.

As Per FCC §15.205(a) and RSS-Gen except as show in paragraph (d) of this section, only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.090 – 0.110	16.42 – 16.423	960 – 1240	4.5 – 5.15
0.495 – 0.505	16.69475 – 16.69525	1300 – 1427	5.35 – 5.46
2.1735 – 2.1905	25.5 – 25.67	1435 – 1626.5	7.25 – 7.75
4.125 – 4.128	37.5 – 38.25	1645.5 – 1646.5	8.025 – 8.5
4.17725 – 4.17775	73 – 74.6	1660 – 1710	9.0 – 9.2
4.20725 – 4.20775	74.8 – 75.2	1718.8 – 1722.2	9.3 – 9.5
6.215 – 6.218	108 – 121.94	2200 – 2300	10.6 – 12.7
6.26775 – 6.26825	123 – 138	2310 – 2390	13.25 – 13.4
6.31175 – 6.31225	149.9 – 150.05	2483.5 – 2500	14.47 – 14.5
8.291 – 8.294	156.52475 – 156.52525	2690 – 2900	15.35 – 16.2
8.362 – 8.366	156.7 – 156.9	3260 – 3267	17.7 – 21.4
8.37625 – 8.38675	162.0125 – 167.17	3.332 – 3.339	22.01 – 23.12
8.41425 – 8.41475	167.72 – 173.2	3.3458 – 3.358	23.6 – 24.0
12.29 – 12.293	240 – 285	3.600 – 4.400	31.2 – 31.8
12.51975 – 12.52025	322 – 335.4		36.43 – 36.5
12.57675 – 12.57725	399.9 – 410		Above 38.6
13.36 – 13.41	608 – 614		

As per FCC §15.209(a): Except as provided elsewhere in this Subpart, the emissions from an intentional radiator shall not exceed the field strength levels specified in the following table:

Frequency (MHz)	Field Strength (micro volts/meter)	Measurement Distance (meters)
0.009 - 0.490	2400/F(kHz)	300
0.490 - 1.705	24000/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

** Except as provided in paragraph (g), fundamental emissions from intentional radiators operating under this Section shall not be located in the frequency bands 54-72 MHz, 76-88 MHz, 174-216 MHz or 470-806 MHz. However, operation within these frequency bands is permitted under other sections of this Part, e.g., Sections 15.231 and 15.241.

As per FCC §15.247 (d) In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operating, the radio frequency power that is produced by the intentional radiator shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power, based on either an RF conducted or a radiated measurement, provided the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of RMS averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation required under this paragraph shall be 30 dB instead of 20 dB. Attenuation below the general limits specified in §15.209(a) is not required. In addition, radiated emissions which fall in the restricted bands, as defined in §15.205(a), must also comply with the radiated emission limits specified in §15.209(a) (see §15.205(c)).

As per ISED RSS-Gen 8.9,

Except when the requirements applicable to a given device state otherwise, emissions from licence-exempt transmitters shall comply with the field strength limits shown in Table 4 or Table 5 below. Additionally, the level of any transmitter emission shall not exceed the level of the transmitter's fundamental emission.

Table 4 – General Field Strength Limits for Licence-Exempt Transmitters at Frequencies Above 30 MHz

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

* Unless otherwise specified, for all frequencies greater than 1 GHz, the radiated emission limits for licence-exempt radio apparatus stated in applicable RSSs (including RSS-Gen) are based on measurements using a linear average detector function having a minimum resolution bandwidth of 1 MHz. If an average limit is specified for the EUT, then the peak emission shall also be measured with instrumentation properly adjusted for such factors as pulse desensitization to ensure the peak emission is less than 20 dB above the average limit.

Note: Transmitting devices are not permitted in restricted frequency bands unless stated otherwise in the specific RSS.

As per ISED RSS-247 §6.6,

In any 100 kHz bandwidth outside the frequency band in which the spread spectrum device, digitally modulated device, or hybrid system is operating, the RF power that is produced shall be at least 20 dB below that in the 100 kHz bandwidth within the band that contains the highest level of the desired power – based on either an RF conducted or a radiated measurement – provided that the transmitter demonstrates compliance with the peak conducted power limits. If the transmitter complies with the conducted power limits based on the use of root-mean-square averaging over a time interval, as permitted under section 6.3.2, the attenuation required shall be 30 dB instead of 20 dB. Attenuation below the general field strength limits specified in RSS-Gen is not required.

6.2 Test Setup

The radiated emissions tests were performed in the 5-meter Chamber, using the setup in accordance with ANSI C63.10. The specification used was the FCC 15 Subpart C and ISEDC RSS-247 limits.

The spacing between the peripherals was 10 centimeters.

External I/O cables were draped along the edge of the test table and bundle when necessary.

6.3 Test Procedure

For the radiated emissions test, the EUT host, and all support equipment power cords was connected to the AC floor outlet.

Maximizing procedure was performed on the highest emissions to ensure that the EUT complied with all installation combinations.

The EUT was set 3 meter away from the testing antenna, which was varied from 1-4 meter, and the EUT was placed on a turntable, which was 0.8 meter and 1.5 meter above the ground plane for below and above 1000 MHz measurements, the table shall be rotated for 360 degrees to find out the highest emission. The receiving antenna should be changed the polarization both of horizontal and vertical.

The spectrum analyzer or receiver is set as:

9kHz to 150kHz:

RBW = 200 Hz / VBW = 1 kHz / Sweep = Auto

150kHz to 30MHz:

RBW = 9 kHz / VBW = 30 kHz / Sweep = Auto

30MHz to 1000 MHz:

RBW = 100 kHz / VBW = 300 kHz / Sweep = Auto

Above 1000 MHz:

(1) Peak: RBW = 1MHz / VBW = 1MHz / Sweep = Auto

(2) Average: RBW = 1MHz / VBW = 10Hz or 1/T/ Sweep = Auto

6.4 Corrected Amplitude and Margin Calculation

For emissions below 1 GHz,

The Corrected Amplitude (CA) is calculated by adding the Correction Factor to the S.A. Reading. The basic equation is as follows:

$$CA = \text{S.A. Reading} + \text{Correction Factor}$$

For example, a corrected amplitude of 40.3 dB μ V/m = S.A. Reading (32.5 dB μ V) + Correction Factor (7.8 dB/m)

The Correction Factor is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) together. This calculation is done in the measurement software, and reported in the test result section. The basic equation is as follows:

$$\text{Correction Factor} = AF + CL + \text{Atten} - Ga$$

The “Margin” column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

For emission above 1 GHz,

The Corrected Amplitude (CA) is calculated by adding the Antenna Factor (AF), the Cable Loss (CL), the Attenuator Factor (Atten) and subtracting the Amplifier Gain (Ga) to indicated Amplitude (Ai) reading. The basic equation is as follows:

$$CA = Ai + AF + CL + \text{Atten} - Ga$$

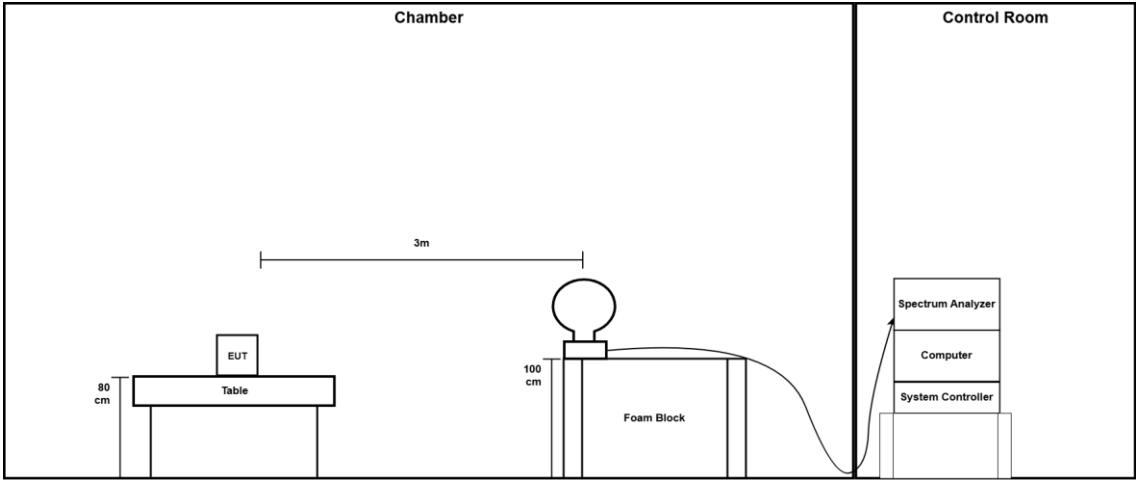
For example, a corrected amplitude of 40.3 dB μ V/m = Indicated Reading (32.5 dB μ V) + Antenna Factor (+23.5dB) + Cable Loss (3.7 dB) + Attenuator (10 dB) - Amplifier Gain (29.4 dB)

The “Margin” column of the following data tables indicates the degree of compliance within the applicable limit. For example, a margin of -7 dB means the emission is 7 dB below the maximum limit. The equation for margin calculation is as follows:

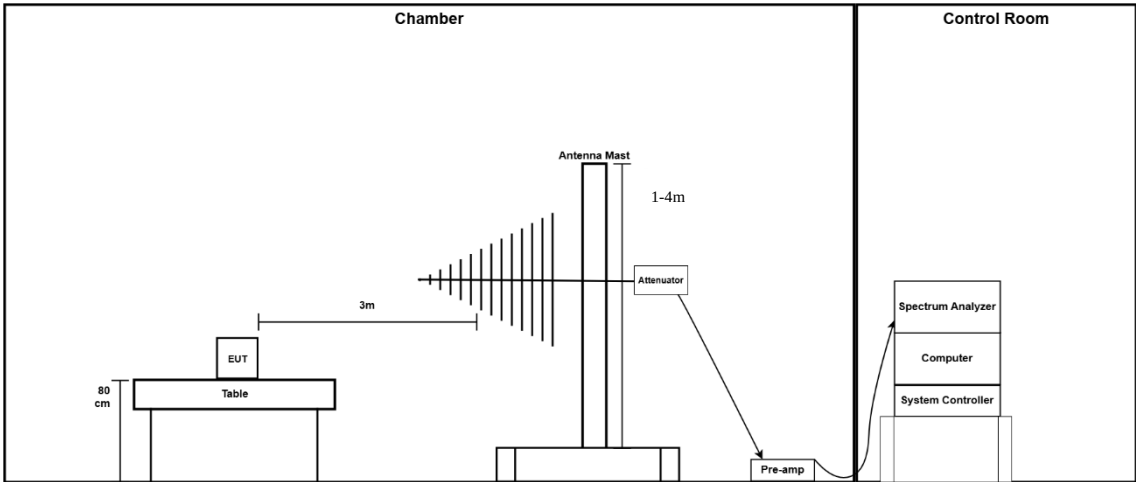
$$\text{Margin} = \text{Corrected Amplitude} - \text{Limit}$$

6.5 Test Setup and Block Diagram

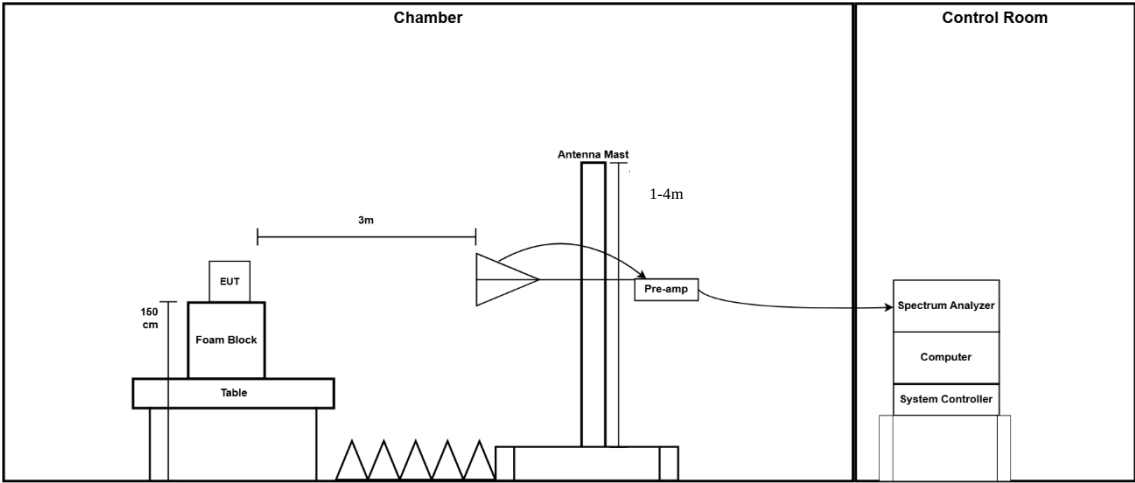
9 kHz to 30 MHz



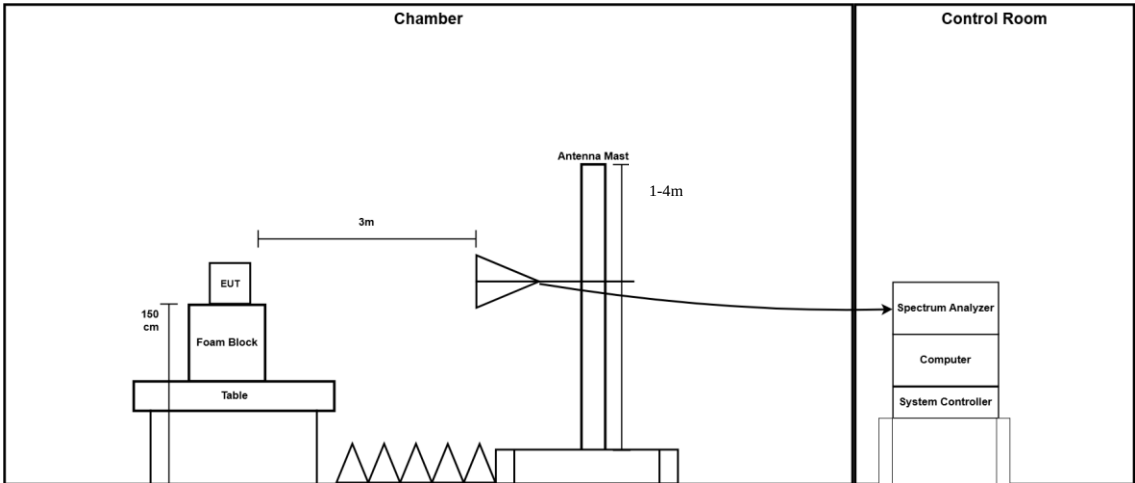
30 MHz to 1 GHz



Above 1 GHz, with external preamplifier



Above 1 GHz, without external preamplifier



6.6 Test Equipment List and Details

BACL No	Manufacturer	Description	Model No.	Serial No.	Calibration Date	Calibration Interval
327	Sunol Sciences	System Controller	SC110V	122303-1	N/R	N/R
1075	Sunol Sciences	Boresight Antenna Tower	TLT3	050119-7	N/R	N/R
1388	Sunol Sciences	Flush Mount Turntable	FM	112005-2	N/R	N/R
1432	Keysight Technologies	MXE EMI Receiver, Multi-touch	N9038B	MY60180008	2026-01-22	1 year
393	Com-Power	Loop Antenna, Active	AL-130	17043	2025-05-06	2 years
321	Sunol Sciences	Biconilog Antenna	JB3	A020106-2	2025-12-16	2 years
1245	Pasternack	Attenuator	PE7390-6	01182018A	2025-12-16	2 years
316	Sonoma Instruments	Preamplifier	317	260406	2025-11-12	6 months
1210	Pasternack	N-type Coax Cable, 50ft RG213	PE3496-0600	2103161	2025-11-12	6 months
1248	Pasternack	RG214 COAX Cable	PE3062	BACL01248A	2025-10-03	1 year
1246	Hewlet Packard	RF Limiter	11867A	01734	2026-03-05	6 months
1192	ETS Lindgren	Horn Antenna	3117	00218973	2024-10-23	2 years
1545	Megaphase	K-type coax cable	TM40-K1K3-12	20869601 001	2026-02-17	6 months
1449	BACL	Preamplifier	BACL-1313-A100M18G	4052472	2026-02-17	6 months
1295	CarlisleIT	10m Coaxial Cable	UFB142A-1-3937-200200	64639890912-001	2025-10-16	6 months
91	Wisewave	Horn Antenna	ARH-4223-02	10555-02	2026-03-12	2 years
1546	Megaphase	SMA coax cable	TM26-S1S3-12	20869602 001	2026-02-27	6 months
1451	BACL	Preamplifier	BACL-1313-A1840	4052432	2026-02-17	6 months

Statement of Traceability: **BACL Corp.** attests that all of the calibrations on the equipment items listed above were traceable to NIST or to another internationally recognized National Metrology Institute (NMI), and were compliant with the latest version of A2LA policy P102 "A2LA Policy on Metrological Traceability".

6.7 Test Environmental Conditions

Temperature:	21 to 23 °C
Relative Humidity:	41 to 50 %
ATM Pressure:	101.2 kPa

The testing was performed by Arturo Reyes from 2026-04-01 to 2026-04-06 in 5m chamber 3.

The BT Classic Band Edge testing was performed by Libass Thiaw on 2026-03-31 in 5m chamber 3.

6.8 Summary of Test Results

According to the data hereinafter, the EUT complied with FCC Title 47, Part 15C and ISEDC RSS-247 standard's radiated emissions limits, and had the worst margin of:

Mode: Transmitting			
Margin (dB)	Frequency (MHz)	Polarization (Horizontal/Vertical)	Mode, Channel
-1.67	16130	Horizontal	BT Classic, DH5, High Channel, 2480 MHz

Please refer to the following table and plots for specific test result details.

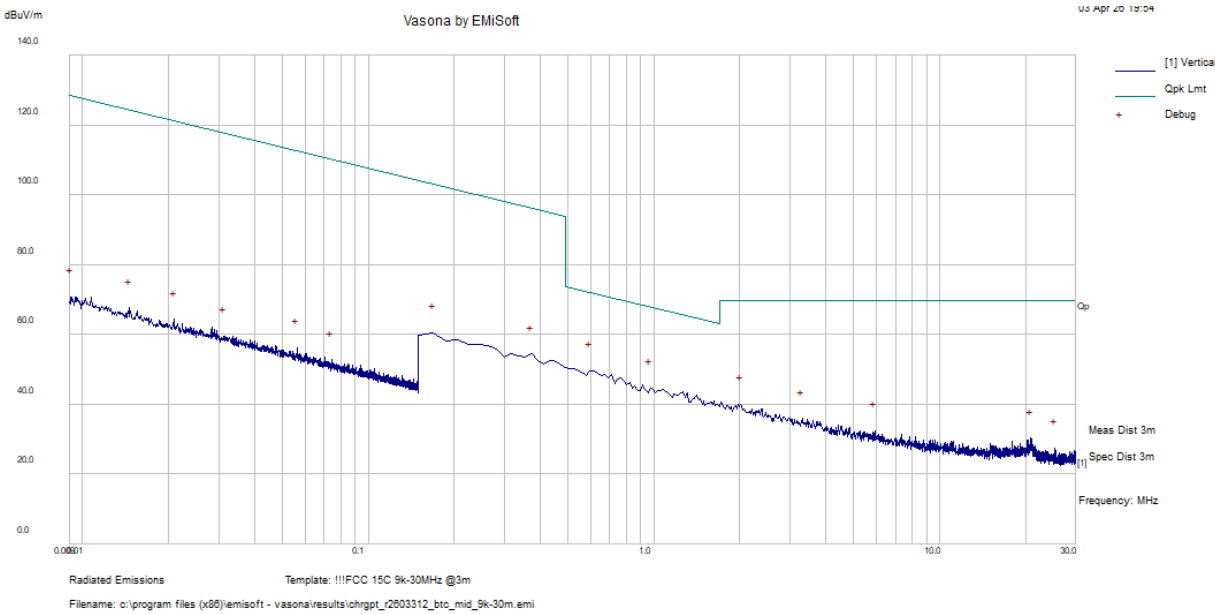
Please refer to Annex A for Band Edges results.

6.9 Radiated Emissions Test Results

Note 1:Pre-scan was performed in order to determine worst-case orientation of device with respect to measurement antenna in the X/Y/Z axis. Plots/data shown represent measurements made in worst-case orientation.

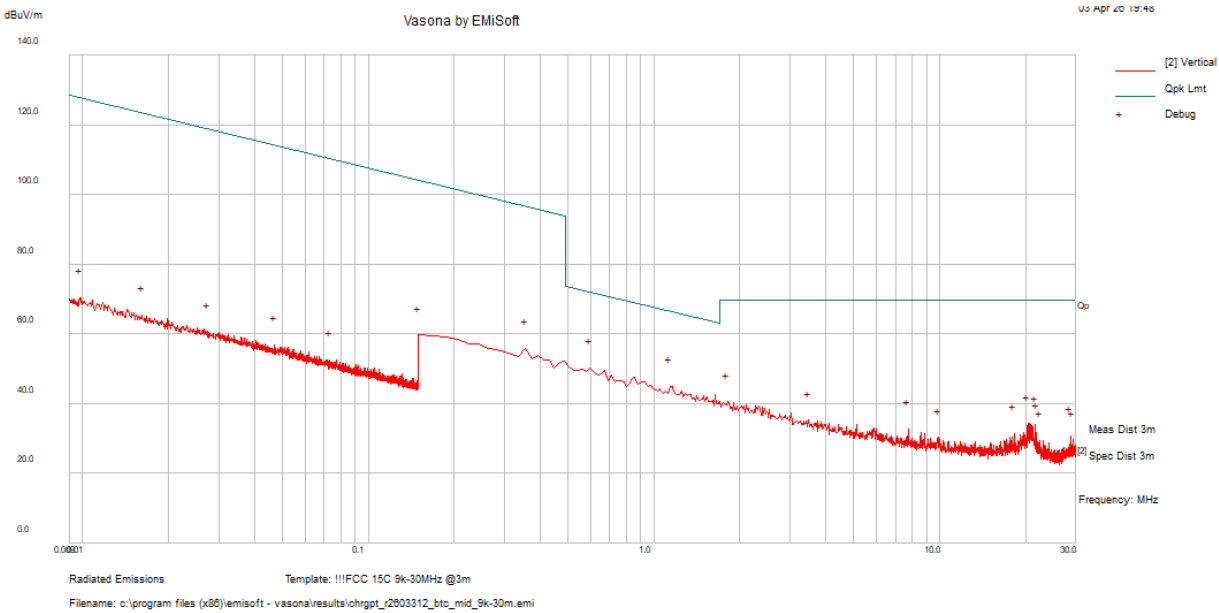
1) 9 kHz – 30 MHz Worst Case, Measured at 3 meters

BT Classic, DH5, Middle Channel, 2442 MHz, Parallel



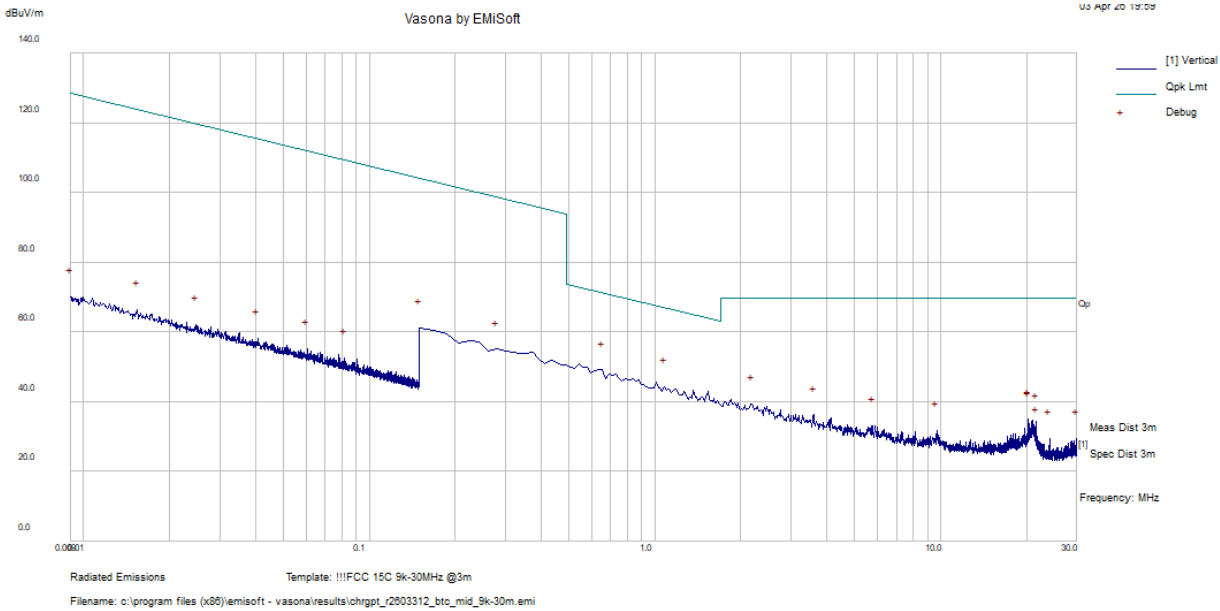
Frequency (MHz)	S.A. Reading (dBμV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector
0.59775	39.54	10.12	49.66	100	Parallel	360	72.08	-22.42	Peak

BT Classic, DH5, Middle Channel, 2442 MHz, Perpendicular



Frequency (MHz)	S.A. Reading (dBµV)	Correction Factor (dB/m)	Corrected Amplitude (dBµV/m)	Antenna Height (cm)	Antenna Polarity	Turntable Azimuth (degrees)	Limit (dBµV/m)	Margin (dB)	Detector
1.138781	34.95	10.05	45	100	Perpendicular	360	66.48	-21.48	Peak

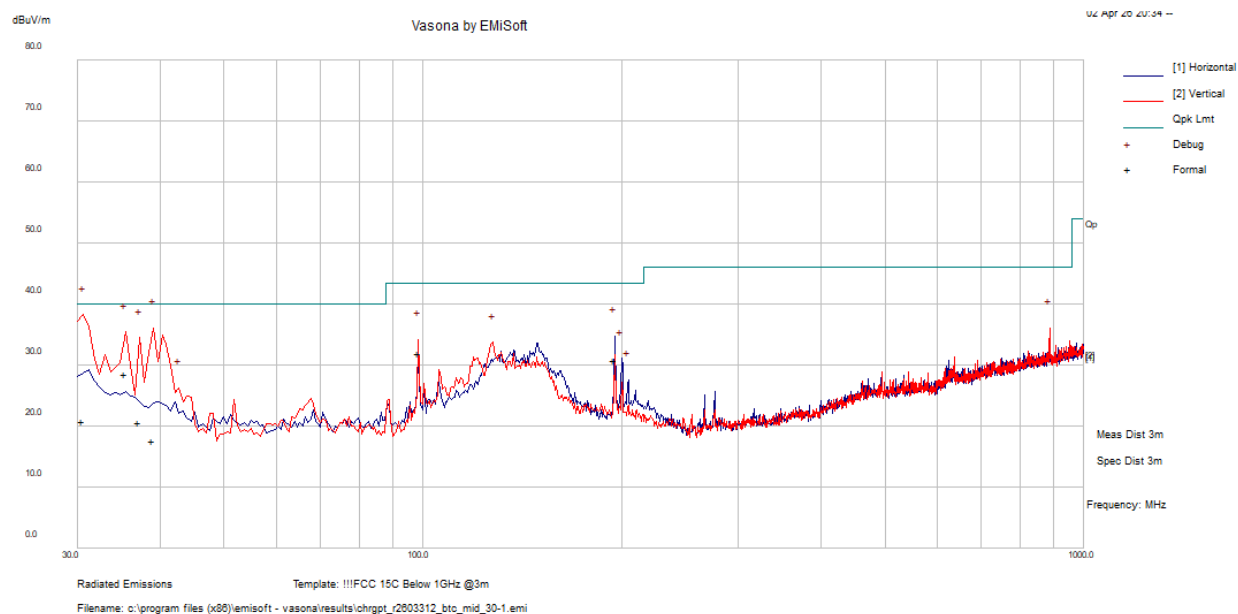
BT Classic, DH5, Middle Channel, 2442 MHz, Ground Parallel



Frequency (MHz)	S.A. Reading (dBμV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector
0.653719	38.99	10.1	49.09	100	Ground Parallel	360	71.3	-22.21	Peak

2) 30 MHz – 1 GHz Worst Case, Measured at 3 meters

BT Classic, DH5, Middle Channel, 2442 MHz



Frequency (MHz)	S.A. Reading (dBμV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector
30.494375	31.24	-10.36	20.88	151	V	39	40	-19.12	QP
39.017813	34.26	-16.71	17.55	124	V	0	40	-22.45	QP
35.376875	42.59	-13.96	28.63	132	V	189	40	-11.37	QP
37.166563	36.02	-15.32	20.7	127	V	128	40	-19.3	QP
194.98938	48.33	-17.46	30.87	164	H	240	43.5	-12.63	QP
98.495625	52.03	-20.12	31.91	100	V	311	43.5	-11.59	QP

FCC/IC Limits for 1 GHz to 26.5 GHz			
Applicability	(dBm)	(μ V/m at 3meters)	(dB μ V/m at 3meters)
Restricted Band Average Limit	-	500	54 ²
Restricted Band Peak Limit ¹	-	-	74

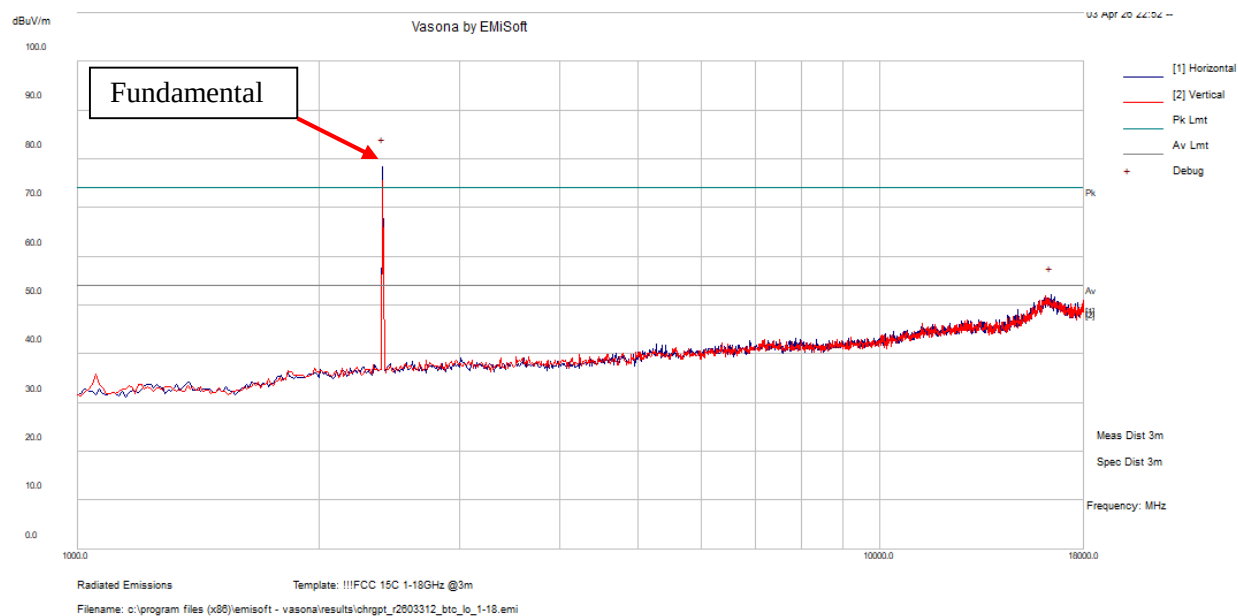
Note 1: Restricted Band Peak Limit is defined to be 20dB higher than Average Limit.

Note 2: Above 1GHz limit calculation:

$$\text{dB}\mu\text{V/m} = 20 \cdot \log(\text{V/m}) + 120 = 20 \cdot \log((500 [\mu\text{V/m}]/1000000)) + 120 = 54 [\text{dB}\mu\text{V/m}]$$

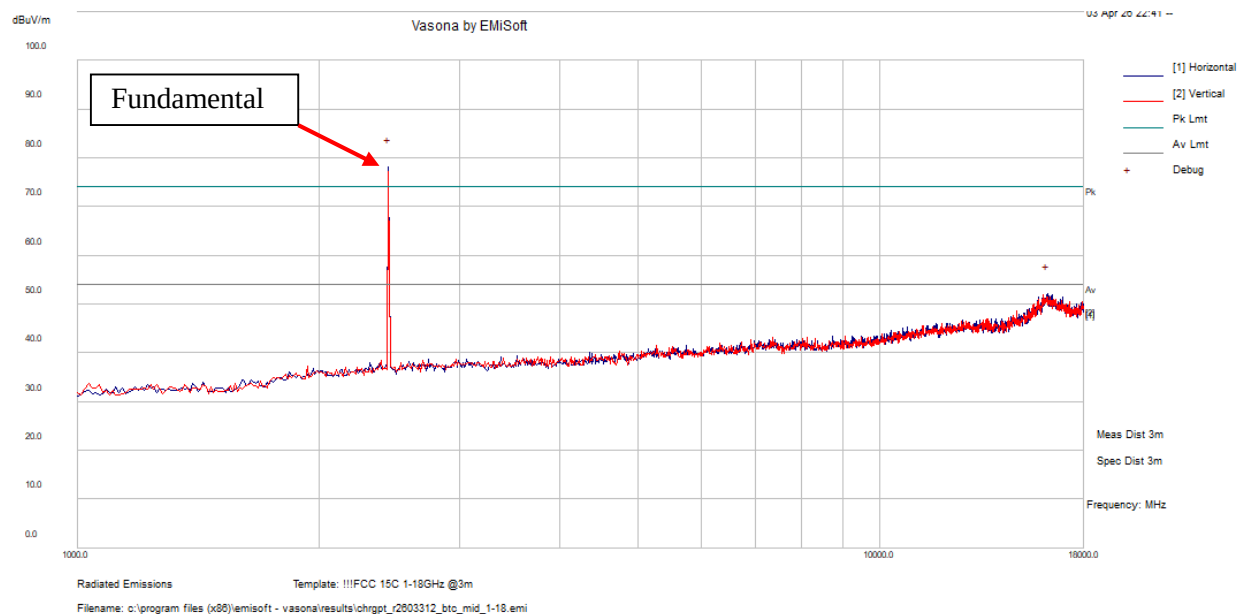
3) 1 – 18 GHz Scan at 3 Meter

BT Classic, DH5, Low Channel, 2402 MHz



Frequency (MHz)	S.A. Reading (dBμV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector
16363.75	32.67	19.36	52.03	300	H	360	54	-1.97	Peak

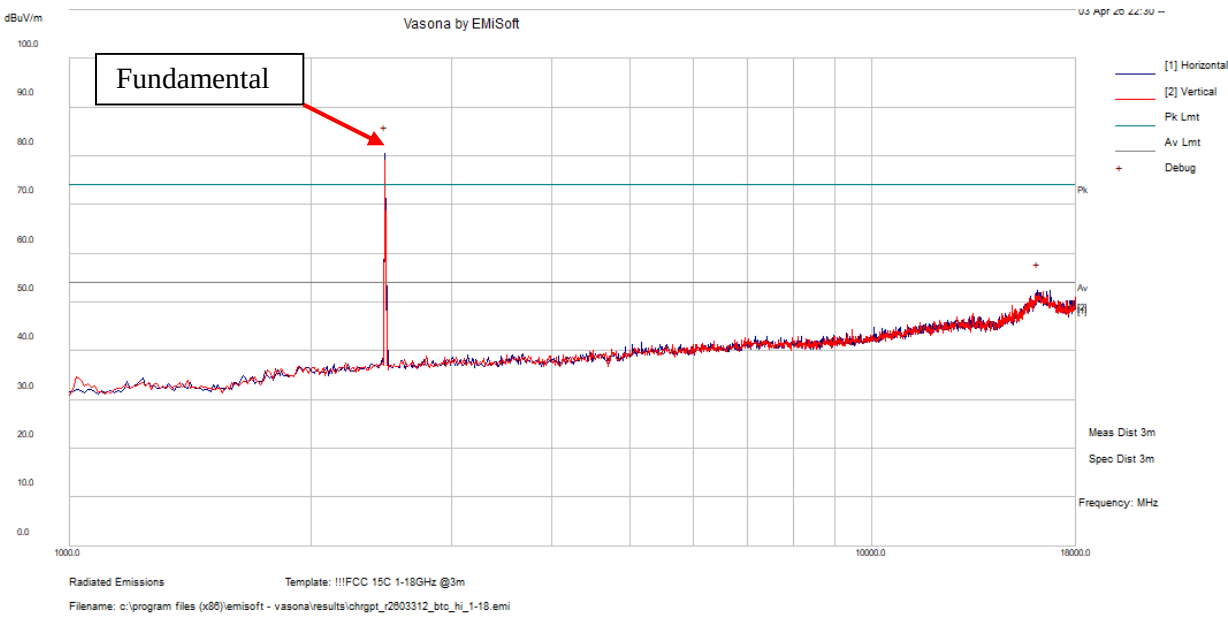
Note: The plot above shows that there were no emissions above the Average Limit at 1-18 GHz frequency range. Hence evaluating by using the Peak Measurement against the Average Limit.

BT Classic, DH5, Middle Channel, 2442 MHz

Frequency (MHz)	S.A. Reading (dBμV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector
16215	32.54	19.65	52.19	300	H	360	54	-1.81	Peak

Note: The plot above shows that there were no emissions above the Average Limit at 1-18 GHz frequency range. Hence evaluating by using the Peak Measurement against the Average Limit.

BT Classic, DH5, High Channel, 2480 MHz

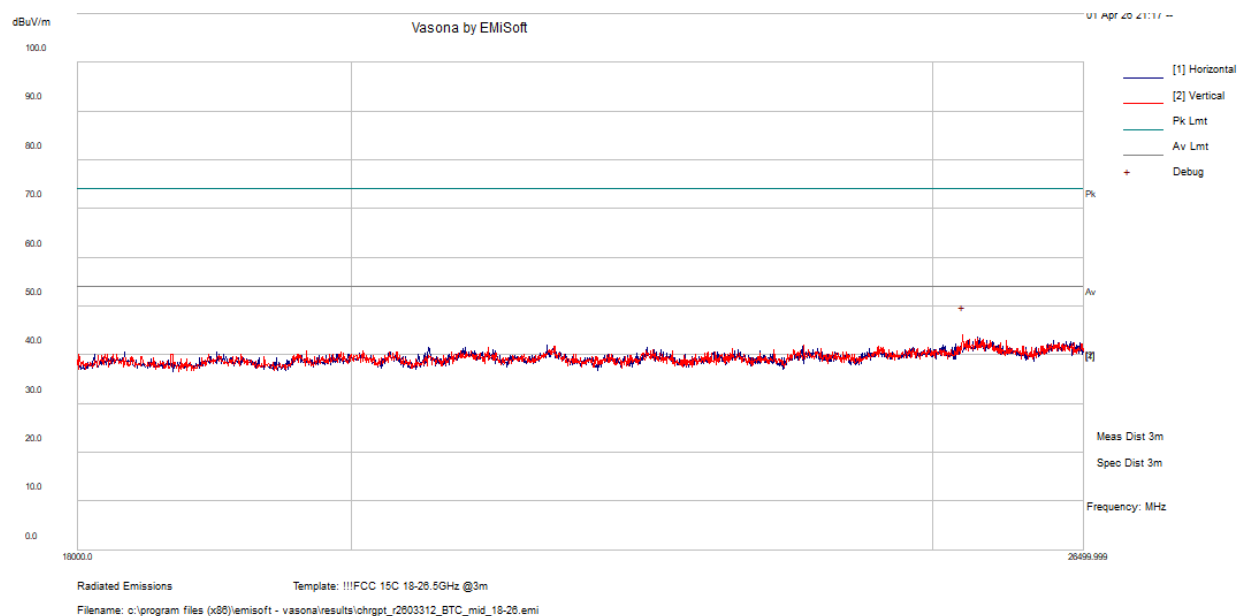


Frequency (MHz)	S.A. Reading (dBμV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector
16130	32.84	19.49	52.33	100	H	360	54	-1.67	Peak

Note: The plot above shows that there were no emissions above the Average Limit at 1-18 GHz frequency range. Hence evaluating by using the Peak Measurement against the Average Limit.

4) 18 GHz – 26.5 GHz Scan at 3 Meter

BT Classic, DH5, Middle Channel, 2442 MHz



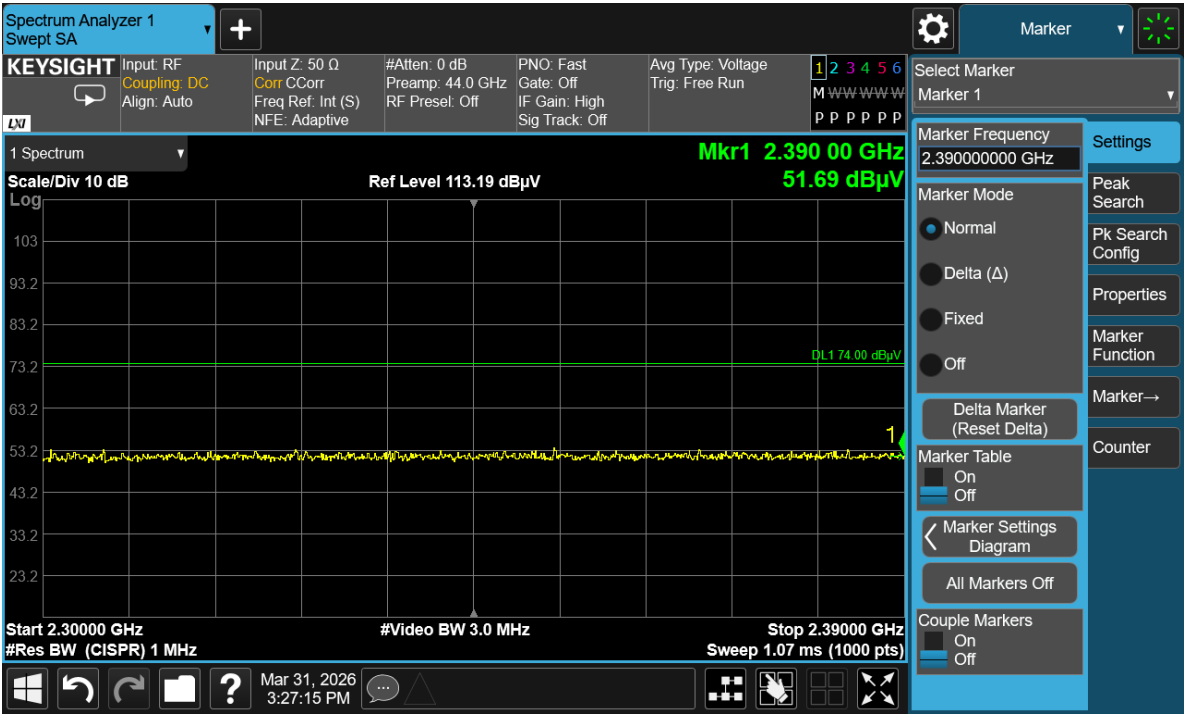
Frequency (MHz)	S.A. Reading (dBμV)	Correction Factor (dB/m)	Corrected Amplitude (dBμV/m)	Antenna Height (cm)	Antenna Polarity (H/V)	Turntable Azimuth (degrees)	Limit (dBμV/m)	Margin (dB)	Detector
25294.062	49.29	-5.19	44.1	200	V	360	54	-9.9	Peak

Note: The plot above shows that there were no emissions above the noise floor at 18-26.5 GHz frequency range. Hence evaluating by using the Peak Measurement against the Average Limit.

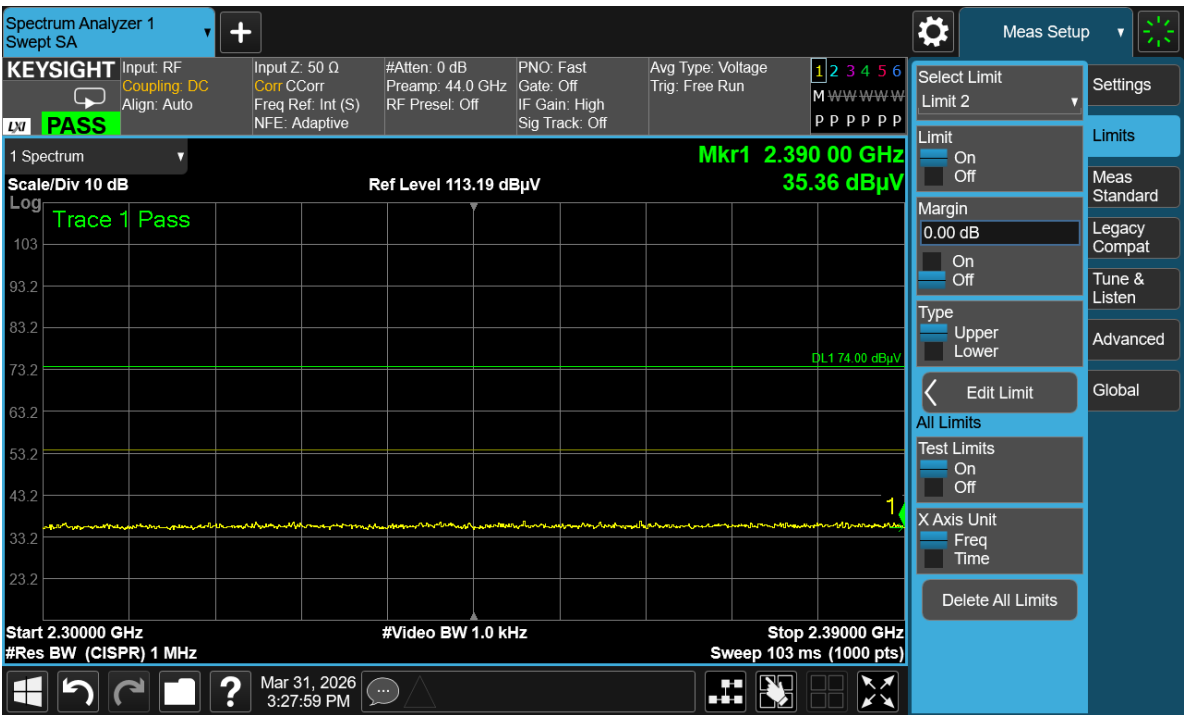
7 Annex A – FCC §15.209 Band Edges Measurement

BT Classic, DH5

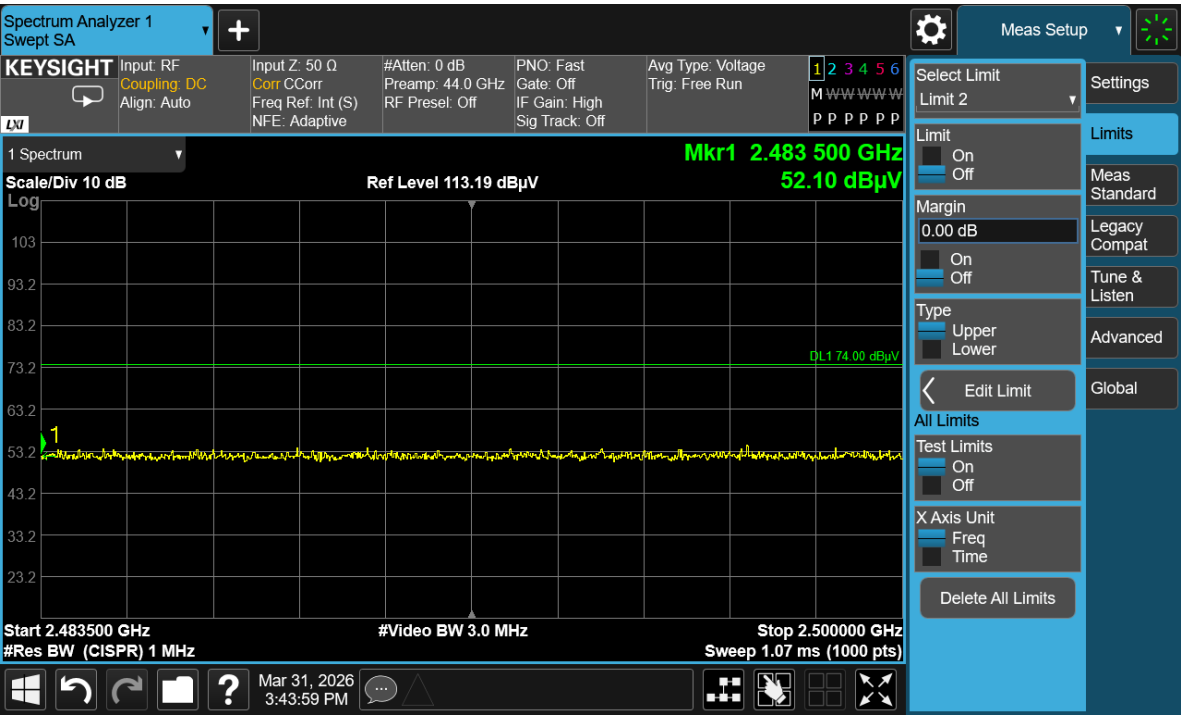
Low Channel, 2402 MHz, Lower Band Edge, Peak Measurement



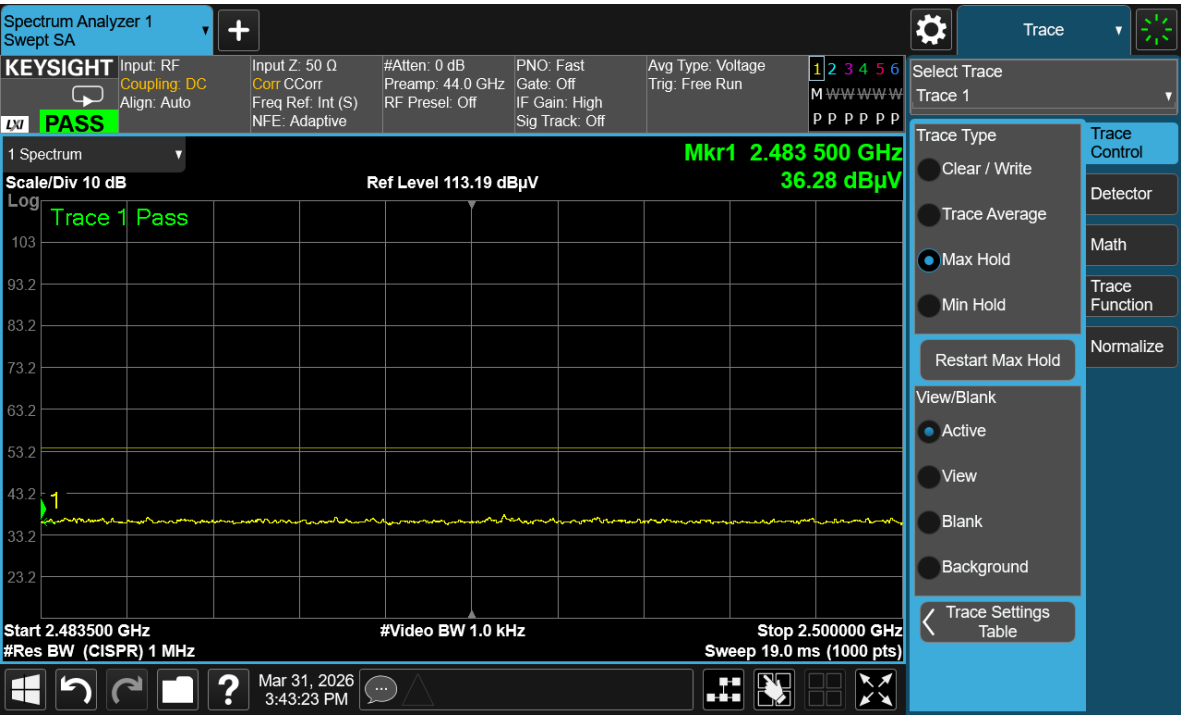
Low Channel, 2402 MHz, Lower Band Edge, Average Measurement



High Channel, 2480 MHz, Upper Band Edge, Peak Measurement

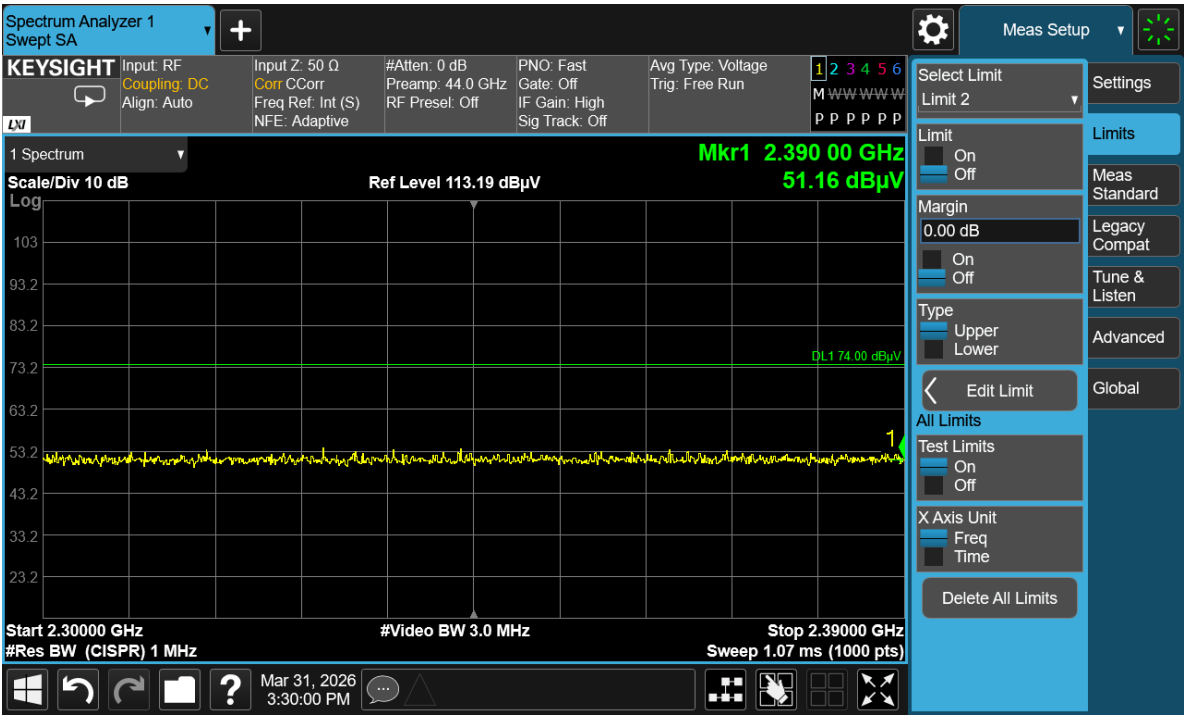


High Channel, 2480 MHz, Upper Band Edge, Average Measurement

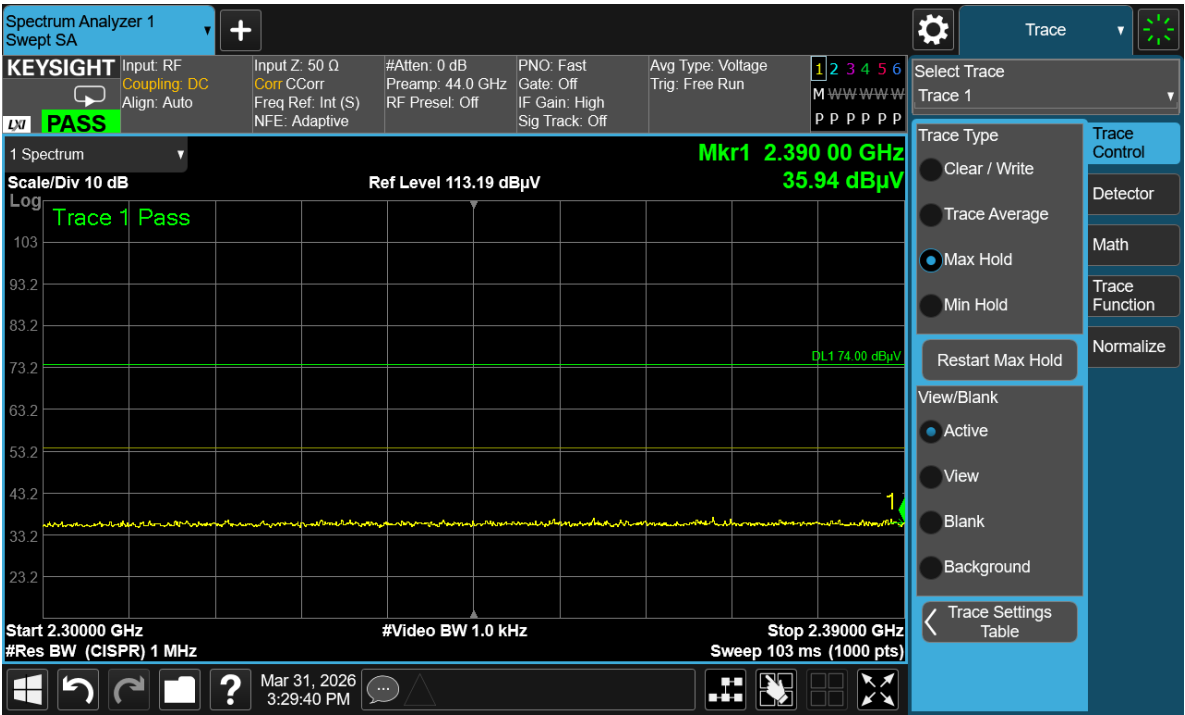


BT Classic, 2DH5

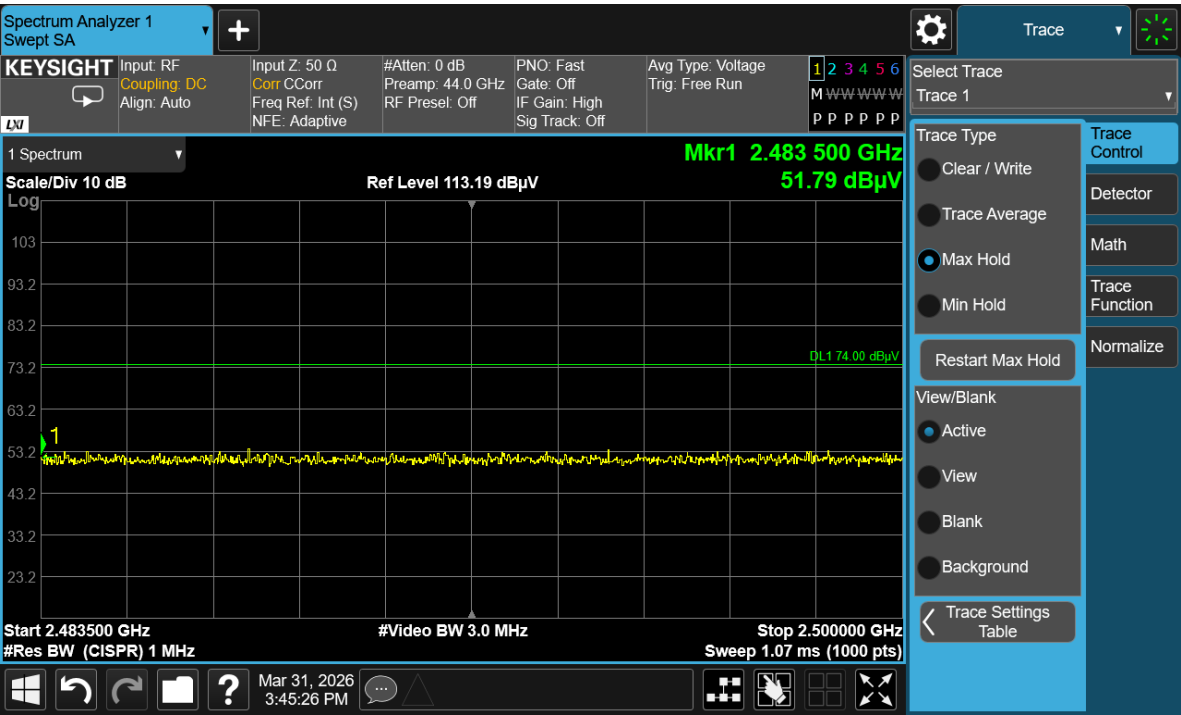
Low Channel, 2402 MHz, Lower Band Edge, Peak Measurement



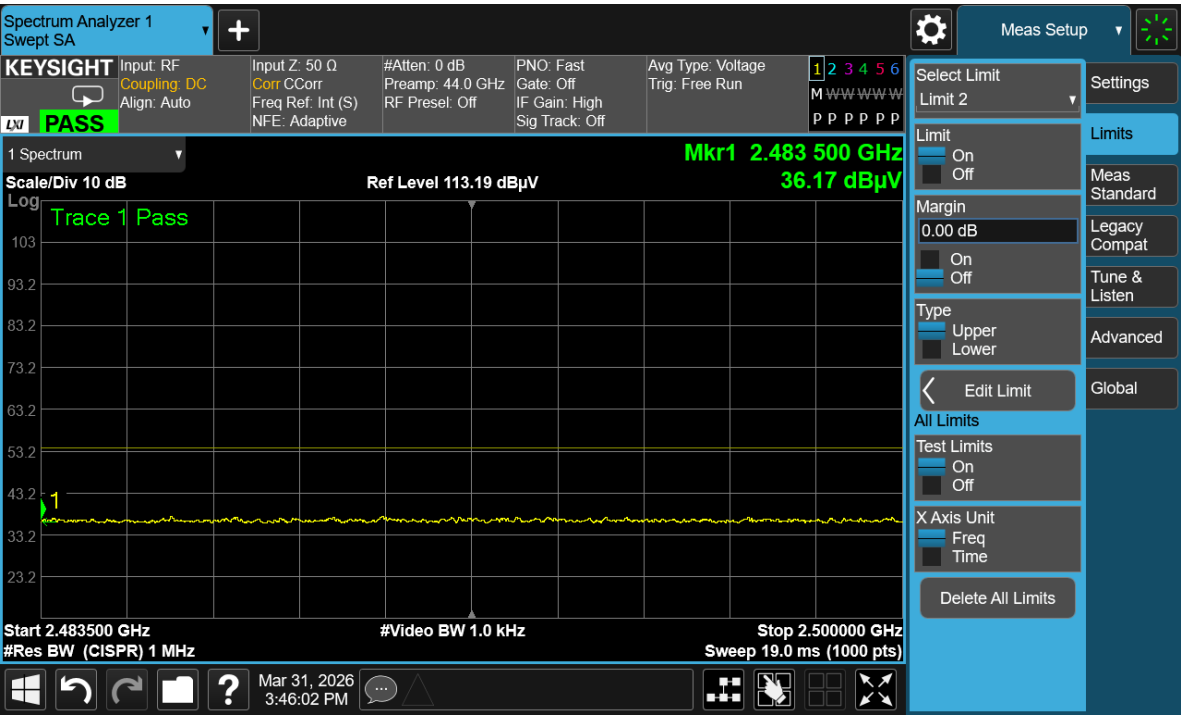
Low Channel, 2402 MHz, Lower Band Edge, Average Measurement



High Channel, 2480 MHz, Upper Band Edge, Peak Measurement

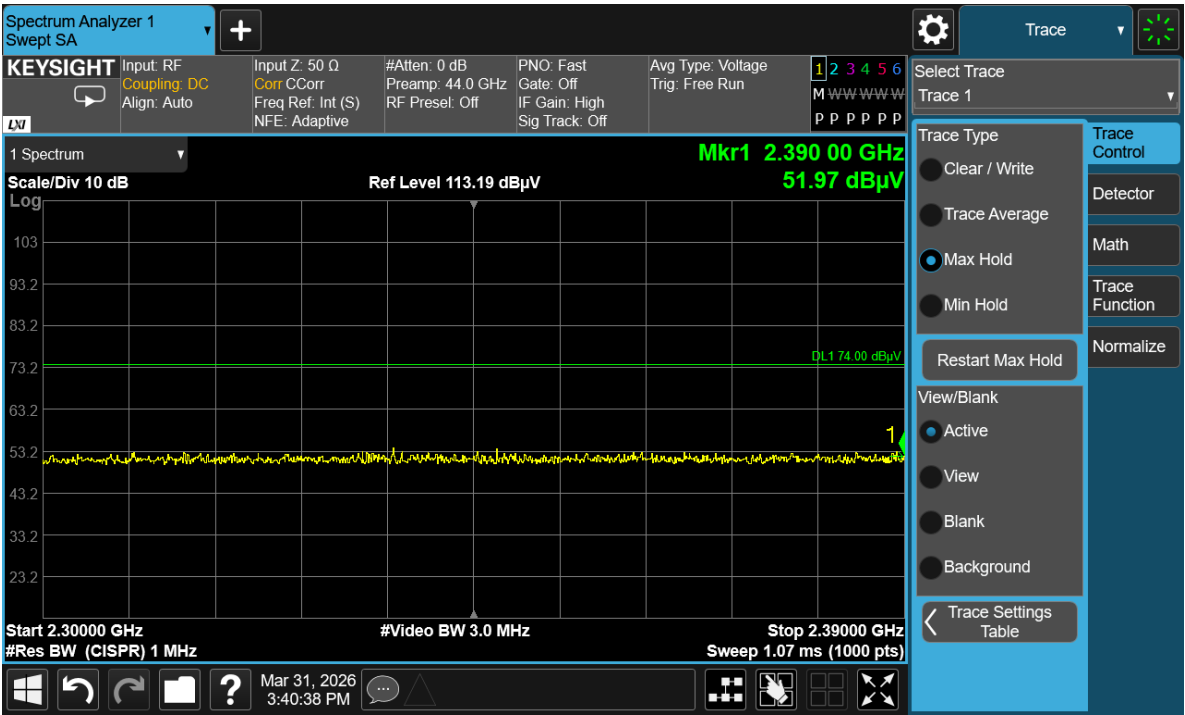


High Channel, 2480 MHz, Upper Band Edge, Average Measurement

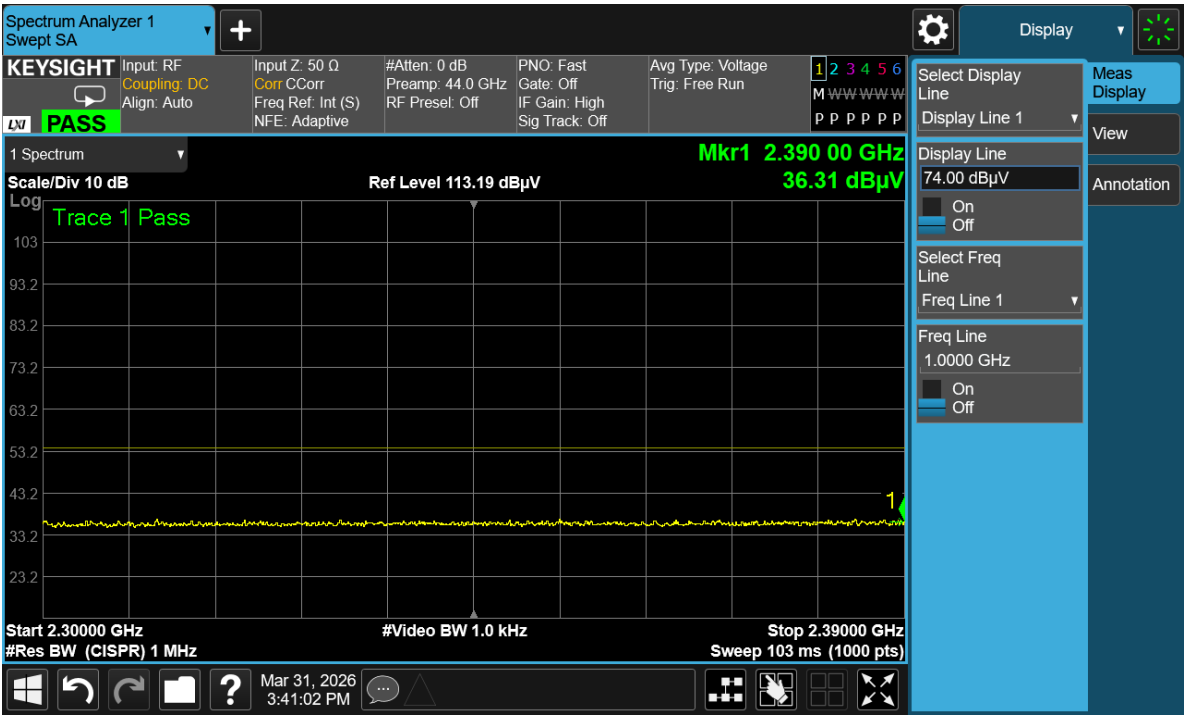


BT Classic, 3DH5

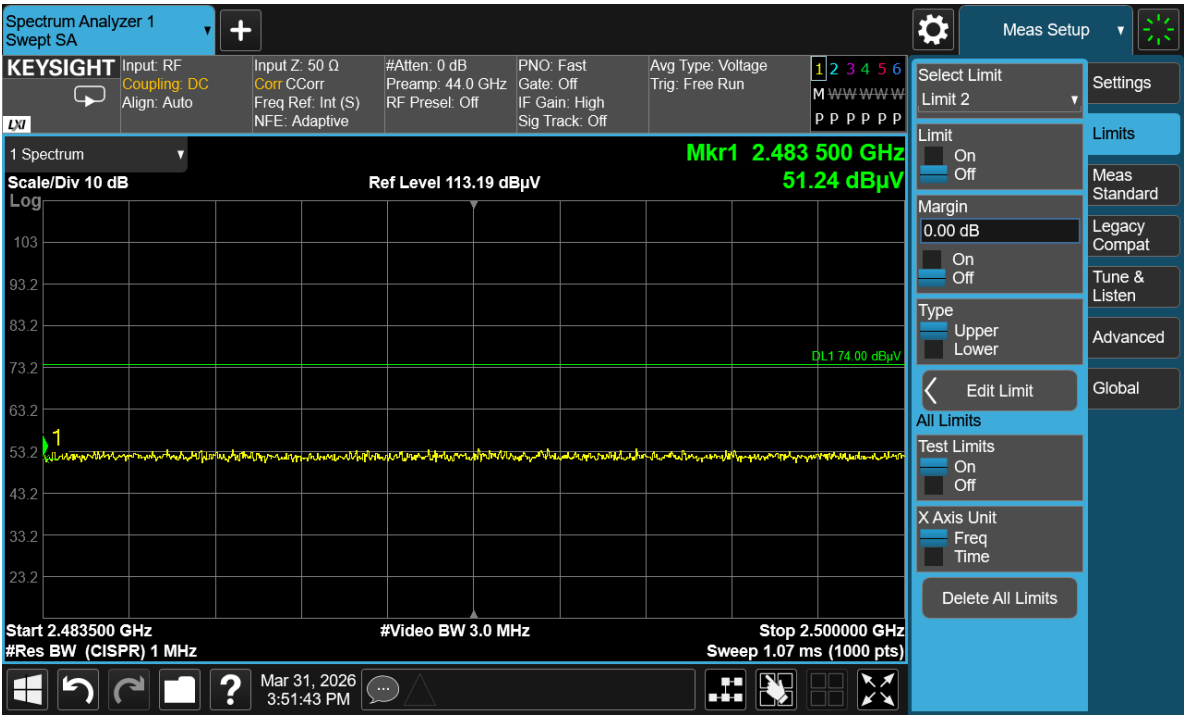
Low Channel, 2402 MHz, Lower Band Edge, Peak Measurement



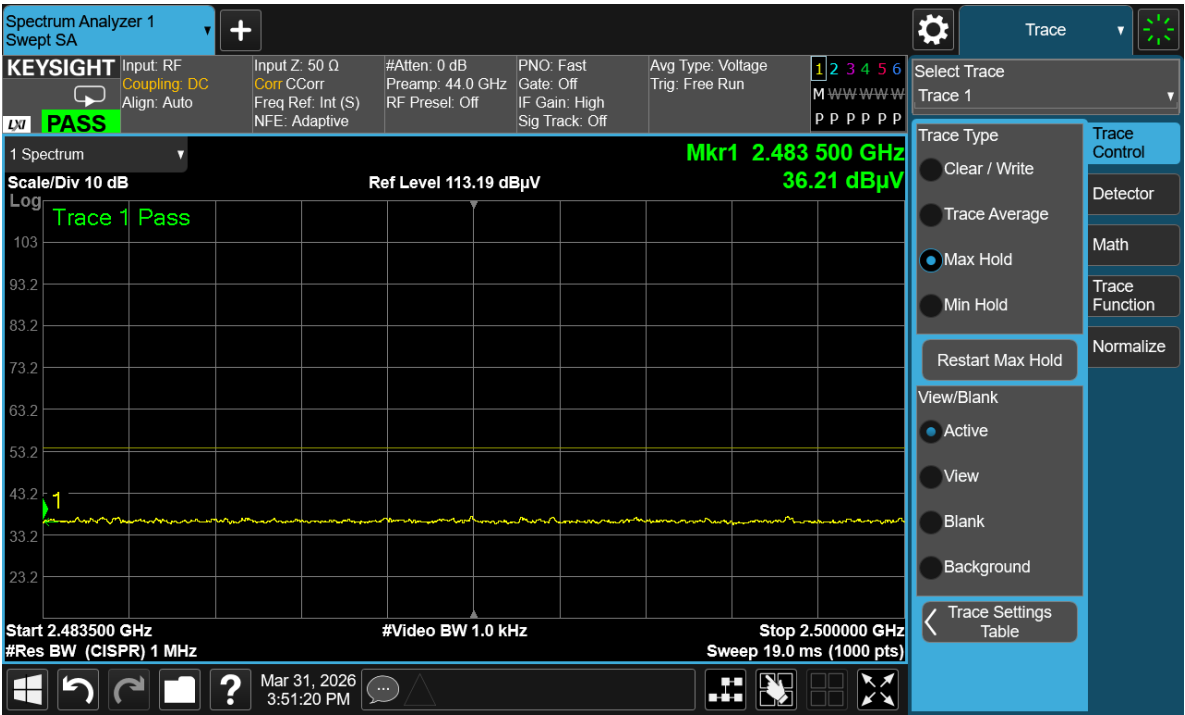
Low Channel, 2402 MHz, Lower Band Edge, Average Measurement



High Channel, 2480 MHz, Upper Band Edge, Peak Measurement



High Channel, 2480 MHz, Upper Band Edge, Average Measurement



8 Appendix A (Normative) - EUT Test Setup Photographs

Please refer to the attachment.

9 Appendix B (Normative) - EUT Photographs

Please refer to the attachment.

10 Appendix C (Normative) - A2LA Electrical Testing Certificate



Accredited Laboratory

A2LA has accredited

BAY AREA COMPLIANCE LABORATORIES CORP.

Sunnyvale, CA

for technical competence in the field of

Electrical Testing

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017 General requirements for the competence of testing and calibration laboratories. This laboratory also meets A2LA R222 - Specific Requirements EPA ENERGY STAR Accreditation Program. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communiqué dated April 2017).



Presented this 13th day of September 2024.

A blue ink signature of Mr. Trace McInturf.

Mr. Trace McInturf, Vice President, Accreditation Services
For the Accreditation Council
Certificate Number 3297.02
Valid to September 30, 2026

For the tests to which this accreditation applies, please refer to the laboratory's Electrical Scope of Accreditation.

Please follow the web link below for a full ISO 17025 scope.

<https://www.a2la.org/scopepdf/3297-02.pdf>

--- END OF REPORT ---