



TEST REPORT

Eurofins KCTL Co.,Ltd. 65, Sinwon-ro, Yeongtong-gu, Suwon-si, Gyeonggi-do, 16677, Korea TEL: 82-70-5008-1021 FAX: 82-505-299-8311 www.kctl.co.kr	Report No.: KR25-SRF0091-B Page (1) of (37)	KCTL
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- 1. Client**
 - Name : Anoto AB
 - Address : Flaggan 1165 116 74 Stockholm, Sweden
 - Date of Receipt : 2025-01-10
- 2. Use of Report** : Certification
- 3. Name of Product / Model** : Digital Pen / inq-001
- 4. Manufacturer / Country of Origin** : Anoto AB / Sweden
- 5. FCC ID** : WDN-INQ-001
- 6. IC Certificate No.** : 7776A-INQ001
- 7. Date of Test** : 2025-02-03 to 2025-03-12
- 8. Location of Test** : ☒ Permanent Testing Lab ☐ On Site Testing
 (Address: 65, Sinwon-ro, Yeongtong-gu, Suwon-si, Gyeonggi-do, 16677, Korea)
- 9. Test method used** : FCC Part 15 Subpart C, 15.247
 RSS-247 Issue 3 August 2023
 RSS-Gen Issue 5 February 2021
- 10. Test Result** : Refer to the test result in the test report

Affirmation	Tested by Name : Taeung Um	Technical Manager Name : Harim Lee
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2025-04-24

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REPORT REVISION HISTORY

Date	Revision	Page No
2025-04-14	Originally issued	-
2025-04-22	Updated	4
2025-04-24	Updated	4

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Note. The report No. KR25-SRF0091-A is superseded by the report No. KR25-SRF0091-B.

General remarks for test reports

Statement concerning the uncertainty of the measurement systems used for the tests

(may be required by the product standard or client)

☐ Internal procedure used for type testing through which traceability of the measuring uncertainty has been established:

Procedure number, issue date and title:

Calculations leading to the reported values are on file with the testing laboratory that conducted the testing.

☒ Statement not required by the standard or client used for type testing

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1. General information

Client : Anoto AB
 Address : Flaggan 1165 116 74 Stockholm, Sweden
 Manufacturer : Anoto AB
 Address : Flaggan 1165 116 74 Stockholm, Sweden
 Factory : Samkwang Co., Ltd.
 Address : 40, gongdan 4-ro, Jinryang-eup, Gyeongsan-si, Gyeongsangbuk-do, Korea
 Laboratory : Eurofins KCTL Co.,Ltd.
 Address : 65, Sinwon-ro, Yeongtong-gu, Suwon-si, Gyeonggi-do, 16677, Korea
 Accreditations : FCC Site Designation No: KR0040, FCC Site Registration No: 687132
 VCCI Registration No. : R-20080, G-20078, C-20059, T-20056
 CAB Identifier: KR0040
 ISED Number: 8035A
 KOLAS No.: KT231

2. Device information

Equipment under test : Digital Pen
 Model : inq-001
 Derivative Model(FCC) : INQ-101, INQ-101-BLK, INQ-101-WHT, INQ-101-TEA, INQ-101-DTL,
 INQ-101-NVY, INQ-101-DNY, INQ-101-DGN, INQ-101-GRN, inq-001-BLK,
 inq-001-WHT, inq-001-TEA, inq-001-DTL, inq-001-NVY, inq-001-DNY,
 inq-001-DGN, inq-001-GRN
 Derivative Model(IC) : INQ-101
 Modulation technique : Bluetooth(BDR/EDR)_GFSK, $\pi/4$ DQPSK, 8DPSK
 : Bluetooth(BLE)_GFSK
 Number of channels : Bluetooth : 79 ch
 : BLE : 40 ch
 Power source : DC 3.7 V
 Antenna type : Dielectric Chip Antenna
 Antenna gain : 3.29 dBi
 Frequency range : Bluetooth(BDR/EDR/LE) : 2 402 MHz ~ 2 480 MHz
 Software version : 1.0.0.5
 Hardware version : MAIN BOARD V1.0, HAWK EYE V1.1, USB BOARD V0.3,
 FORCE SENSOR V1.0
 Test device serial No. : AR6-AAW-8XH-S9
 Operation temperature : -20 °C ~ 50 °C

2.1. Information about derivative model

The basic and derivative models are only differences in marketing purposes.
 The basic and derivative models are electrically identical.

2.2. Frequency/channel operations

This device contains the following capabilities:
 Bluetooth(BDR/EDR/BLE)

Ch.	Frequency (MHz)
00	2 402
.	.
19	2 440
.	.
39	2 480

Table 2.3.1. Bluetooth Low Energy

2.3. RF power setting in TEST SW

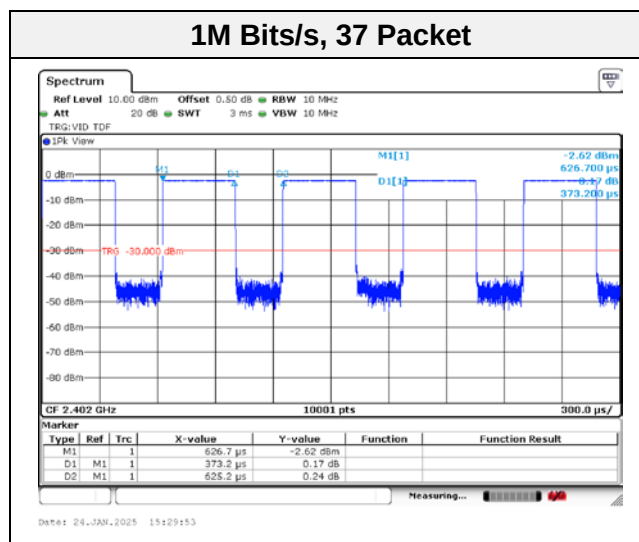
Test condition	Test Program	Frequency (MHz)	Power Setting
Bluetooth Low Energy	Set-up Tool	2 402	Default
		2 440	
		2 480	

2.4. Duty Cycle Factor

Test mode	Period (ms)	On time (ms)	Duty cycle		Duty Cycle Factor (dB)
			(Linear)	(%)	
1M Bits/s, 37 Packet	0.627	0.373	0.595 5	59.55	2.25

Notes.

1. Duty cycle (Linear) = T_{on} time / Period
2. DCF(Duty cycle factor) = $10\log(1/\text{duty cycle})$
3. DCF is not compensated to average result if the duty cycle is more than 98%



3. Antenna requirement

Requirement of FCC part section 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.

Requirement of RSS-Gen Section 6.8:

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.

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.

- The transmitter has permanently attached Dielectric Chip antenna (internal antenna) on board.
- The E.U.T Complies with the requirement of §15.203, §15.247.

4. Summary of tests

FCC Part Section(s)	IC Rule Reference	Parameter	Test Mode	Test Results
15.247(b)(3)	RSS-247 (5.4)(d)	Maximum Peak Output Power	Conducted	Pass
15.247(e)	RSS-247 (5.2)(b)	Peak Power Spectral Density		Pass
15.247(a)(2)	RSS-247 (5.2)(a)	6 dB Channel Bandwidth		Pass
-	RSS-Gen (6.7)	Occupied Bandwidth		Pass
15.207(a)	RSS-Gen (8.8)	AC Conducted Emissions		Pass
15.247(d), 15.205(a), 15.209(a)	RSS-Gen (8.9), (8.10) RSS-247(5.5)	Spurious emission	Radiated	Pass
		Band-edge, restricted band		Pass

Notes: (N/T: Not Tested, N/A: Not Applicable)

- All modes of operation and data rates were investigated. The test results shown in the following sections represent the worst case emissions.
- According to exploratory test no any obvious emission were detected from 9 kHz to 30 MHz. Although these tests were performed other than open field site, adequate comparison measurements were confirmed against 30 m open field site. Therefore sufficient tests were made to demonstrate that the alternative site produces results that correlate with the ones of tests made in an open field based on KDB 414788.
- The fundamental of the EUT was investigated in three orthogonal orientations X, Y and Z. It was determined that **X** orientation was worst-case orientation. Therefore, all final radiated testing was performed with the EUT in **X** orientation
- The worst-case data rate were: Packet length 37 Bytes
- The test procedure(s) in this report were performed in accordance as following.
 - ANSI C63.10-2013
 - KDB 558074 D01 v05r02

5. Measurement uncertainty

The measurement uncertainties shown below were calculated in accordance with the requirements of ANSI C63.10-2013.

All measurement uncertainty values are shown with a coverage factor of $k=2$ to indicated a 95 % level of confidence. The measurement data shown herein meets or exceeds the U_{CISPR} measurement uncertainty values specified in CISPR 16-4-2 and thus, can be compared directly to specified limits to determine compliance.

Parameter	Expanded uncertainty ($\pm$)	
Maximum Peak Output Power	0.9 dB	
Peak Power Spectral Density	1.0 dB	
Channel Bandwidth	0.1 %	
Occupied Bandwidth	0.1 %	
Number of hopping channel	0.1 %	
Time of occupancy(dwell time)	0.1 ms	
Conducted spurious emission	2.0 dB	
Radiated spurious emissions (Bandedge, restricted band)	Below 30 MHz	2.3 dB
	30 MHz to 1 000 MHz	2.6 dB
	1 000 MHz to 18 000 MHz	4.8 dB
	Above 18 000 MHz	4.8 dB
AC Conducted Emissions	150 kHz ~ 30 MHz	2.9 dB

6. Measurement results explanation example

The offset level is set in the spectrum analyzer to compensate the RF cable loss factor between EUT conducted output port and spectrum analyzer.

With the offset compensation, the spectrum analyzer reading level is exactly the EUT RF output level.

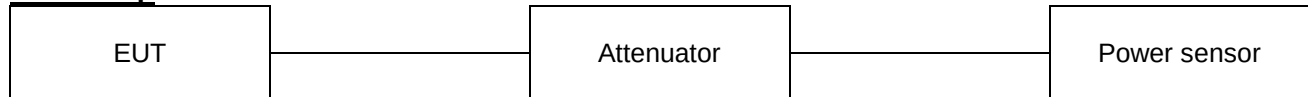
Frequency (MHz)	Factor(dB)	Frequency (MHz)	Factor(dB)
30	10.03	9 000	11.60
50	10.06	10 000	11.68
100	10.11	11 000	11.79
200	10.21	12 000	12.04
300	10.25	13 000	11.74
400	10.35	14 000	11.58
500	10.39	15 000	12.23
600	10.45	16000	12.40
700	10.50	17 000	12.49
800	10.52	18 000	12.76
900	10.58	19 000	12.64
1 000	10.54	20 000	12.79
2 000	10.88	21 000	12.76
3 000	11.11	22 000	13.02
4 000	11.26	23000	14.45
5 000	12.12	24 000	14.56
6 000	12.58	25 000	13.35
7 000	11.56	26 000	13.15
8 000	11.28	26 500	13.28

Note : Offset(dB) = RF cable loss(dB) + Attenuator(dB)

7. Test results

7.1. Maximum peak output power

Test setup



Limit

FCC

According to §15.247(b)(3), For systems using digital modulation in the 902-928 MHz, 2 400-2 483.5 MHz, and 5 725-5 850 MHz bands: 1 Watt. As an alternative to a peak power measurement, compliance with the one Watt limit can be based on a measurement of the maximum conducted output power. Maximum Conducted Output Power is defined as the total transmit power delivered to all antennas and antenna elements averaged across all symbols in the signaling alphabet when the transmitter is operating at its maximum power control level. Power must be summed across all antennas and antenna elements. The average must not include any time intervals during which the transmitter is off or is transmitting at a reduced power level. If multiple modes of operation are possible (e.g., alternative modulation methods), the maximum conducted output power is the highest total transmit power occurring in any mode.

According to §15.247(b)(4) The conducted output power limit specified in paragraph (b) of this section is based on the use of antennas with directional gains that do not exceed 6 dBi. Except as shown in paragraph (c) of this section, if transmitting antennas of directional gain greater than 6 dBi are used, the conducted output power from the intentional radiator shall be reduced below the stated values in paragraphs (b)(1), (b)(2), and (b)(3) of this section, as appropriate, by the amount in dB that the directional gain of the antenna exceeds 6 dBi.

IC

According to RSS-247 5.4(d), For DTSSs employing digital modulation techniques operating in the bands 902-928 MHz and 2400-2483.5 MHz, the maximum peak conducted output power shall not exceed 1 W. The e.i.r.p. shall not exceed 4 W, except as provided in section 5.4(e).

Test procedure

ANSI C63.10 - Section 11.9

Used test method is section 11.9.1.3 and 11.9.2.3.1

Test settings

General

Section 15.247 permits the maximum conducted (average) output power to be measured as an alternative to the maximum peak conducted output power for demonstrating compliance to the limit. When this option is exercised, the measured power is to be referenced to the OBW rather than the DTS bandwidth (see ANSI C63.10 for measurement guidance).

When using a spectrum analyzer or EMI receiver to perform these measurements, it shall be capable of utilizing a number of measurement points in each sweep that is greater than or equal to twice the span/RBW to set a bin-to-bin spacing of $\leq \text{RBW}/2$ so that narrowband signals are not lost between frequency bins.

If possible, configure or modify the operation of the EUT so that it transmits continuously at its maximum power control level. The intent is to test at 100 % duty cycle; however a small reduction in duty cycle (to no lower than 98 %) is permitted, if required by the EUT for amplitude control purposes. Manufacturers are expected to provide software to the test lab to permit such continuous operation.

If continuous transmission (or at least 98 % duty cycle) cannot be achieved due to hardware limitations (e.g., overheating), the EUT shall be operated at its maximum power control level, with the transmit duration as long as possible, and the duty cycle as high as possible during which sweep triggering/signal gating techniques may be used to perform the measurement over the transmission duration.

11.9.1. Maximum peak conducted output power

One of the following procedures may be used to determine the maximum peak conducted output power of a DTS EUT.

11.9.1.1. RBW $\geq$ DTS bandwidth

The following procedure shall be used when an instrument with a resolution bandwidth that is greater than the DTS bandwidth is available to perform the measurement:

- a) Set the RBW $\geq$ DTS bandwidth.
- b) Set VBW $\geq [3 \times \text{RBW}]$.
- c) Set span $\geq [3 \times \text{RBW}]$.
- d) Sweep time = auto couple.
- e) Detector = peak.
- f) Trace mode = max hold.
- g) Allow trace to fully stabilize.
- h) Use peak marker function to determine the peak amplitude level.

11.9.1.3. PKPM1 Peak power meter method

The maximum peak conducted output power may be measured using a broadband peak RF power meter. The power meter shall have a video bandwidth that is greater than or equal to the DTS bandwidth and shall use a fast-responding diode detector.

11.9.2.3.1. Measurement using a power meter (PM)

Method AVGPM is a measurement using an RF average power meter, as follows:

- a) As an alternative to spectrum analyzer or EMI receiver measurements, measurements may be performed using a wideband RF power meter with a thermocouple detector or equivalent if all of the conditions listed below are satisfied:
 - 1) The EUT is configured to transmit continuously, or to transmit with a constant duty cycle.
 - 2) At all times when the EUT is transmitting, it shall be transmitting at its maximum power control level.
 - 3) The integration period of the power meter exceeds the repetition period of the transmitted signal by at least a factor of five.
- b) If the transmitter does not transmit continuously, measure the duty cycle, D, of the transmitter output signal as described in 11.6.
- c) Measure the average power of the transmitter. This measurement is an average over both the ON and OFF periods of the transmitter.
- d) Adjust the measurement in dBm by adding $[10 \log(1/D)]$, where D is the duty cycle

Notes:

A peak responding power sensor is used, where the power sensor system video bandwidth is greater than the occupied bandwidth of the EUT.

Test results

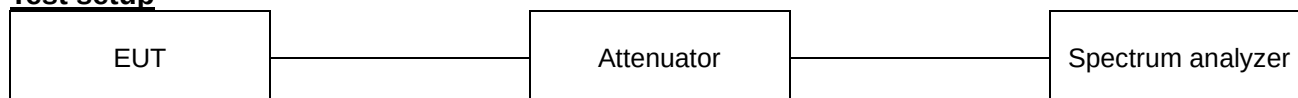
Frequency (MHz)	Data Rate	Packet Length (Bytes)	Conducted Output Power (dBm)		Conducted Power Limit (dBm)	Ant. Gain (dB i)	Max. e.i.r.p.(dB m)		Max. e.i.r.p. Limit (dB m)
	(Bits/s)		Peak	Average			Peak	Average	
2 402	1M	37	-0.55	-0.99	30.00	3.29	2.74	2.30	36.02
2 440			-0.72	-1.22			2.57	2.07	
2 480			-0.39	-0.89			2.90	2.40	

Notes:

1. Measured output power(Average) = reading value of average power + D.C.F
2. e.i.r.p. Calculation: e.i.r.p. (dBm) = Conducted output power (dBm) + Antenna gain (dBi)

7.2. Peak Power Spectral Density

Test setup



Limit

According to §15.247(e) and RSS-247(5.2), For digitally modulated systems, the power spectral density conducted from the intentional radiator to the antenna shall not be greater than 8 dBm in any 3 kHz band during any time interval of continuous transmission. This power spectral density shall be determined in accordance with the provisions of paragraph (b) of this section. The same method of determining the conducted output power shall be used to determine the power spectral density.

Test procedure

ANSI C63.10 - Section 11.10.2

Test settings

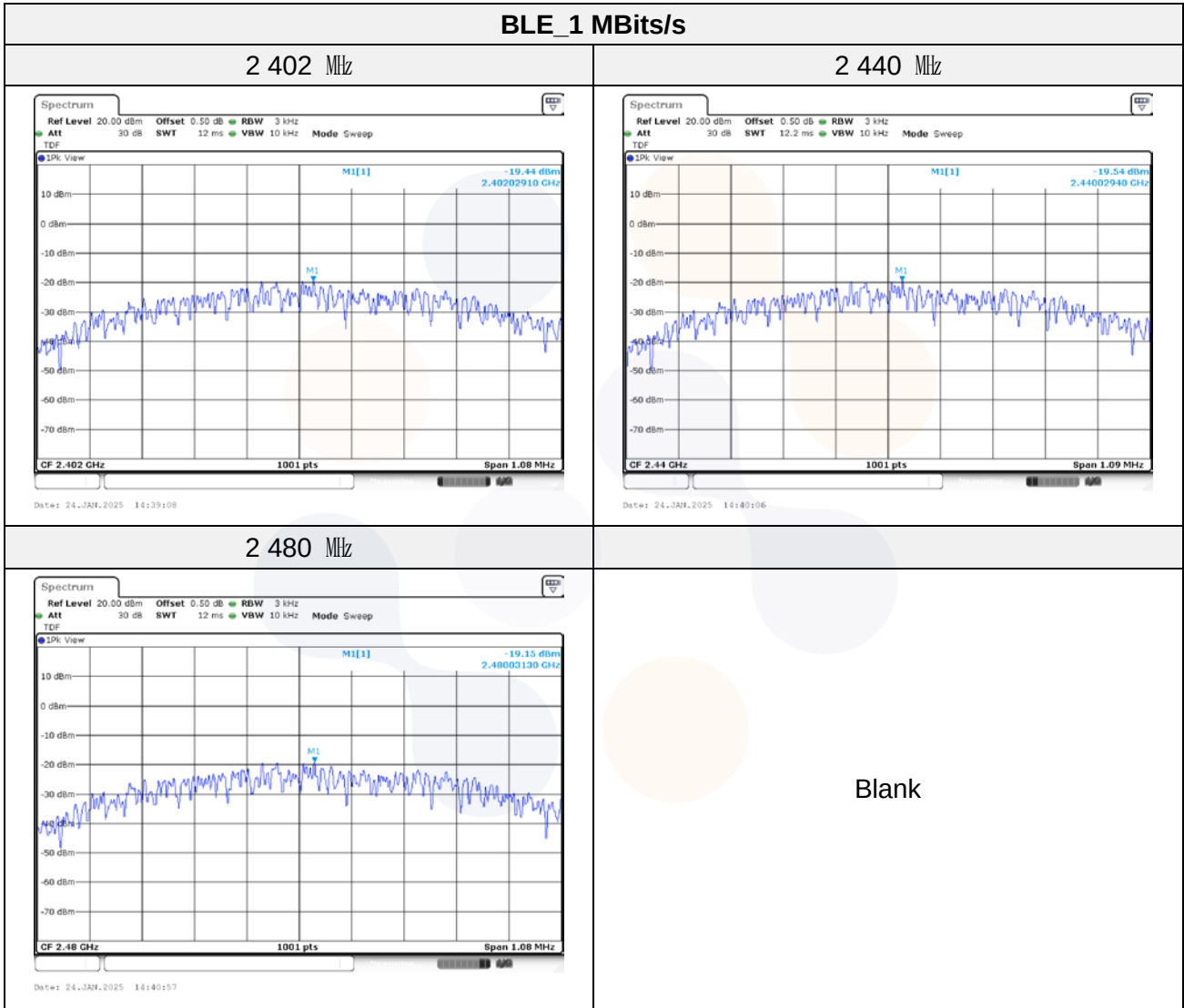
Method PKPSD (peak PSD)

The following procedure shall be used if maximum peak conducted output power was used to determine compliance, and it is optional if the maximum conducted (average) output power was used to determine compliance:

- 1) Set analyzer center frequency to DTS channel center frequency.
- 2) Set the span to 1.5 times the DTS bandwidth.
- 3) Set the RBW to: $3 \text{ kHz} \leq \text{RBW} \leq 100 \text{ kHz}$.
- 4) Set the VBW $\geq 3 \times \text{RBW}$.
- 5) Detector = peak.
- 6) Sweep time = auto couple.
- 7) Trace mode = max hold.
- 8) Allow trace to fully stabilize.
- 9) Use the peak marker function to determine the maximum amplitude level within the RBW.
- 10) If measured value exceeds limit, reduce RBW (no less than 3 kHz) and repeat.

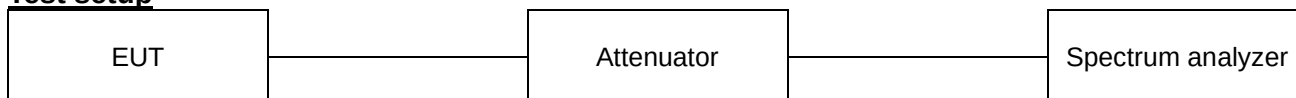
Test results

Frequency(MHz)	Data Rate	Packet Length	PSD(dBm/3 kHz)	Limit(dBm/3 kHz)
	(Bits/s)	(Bytes)		
2 402	1M	37	-19.44	8.00
2 440			-19.54	
2 480			-19.15	



7.3. 6 dB Bandwidth(DTS Channel Bandwidth) & 99% Bandwidth

Test setup



Limit

According to §15.247(a)(2) and RSS-247(5.2) For Systems using digital modulation techniques may operate in the 902–928 MHz, 2 400–2 483.5 MHz, and 5 725–5 850 MHz bands. The minimum 6 dB bandwidth shall be at least 500 kHz.

Test procedure

ANSI C63.10 – Section 11.8.2

Test settings

DTS bandwidth

One of the following procedures may be used to determine the modulated DTS bandwidth.

Option 1

- 1) Set RBW = 100 kHz.
- 2) Set the video bandwidth (VBW) $\geq 3 \times$ RBW.
- 3) Detector = Peak.
- 4) Trace mode = max hold.
- 5) Sweep = auto couple.
- 6) Allow the trace to stabilize.
- 7) Measure the maximum width of the emission that is constrained by the frequencies associated with the two outermost amplitude points (upper and lower frequencies) that are attenuated by 6 dB relative to the maximum level measured in the fundamental emission.

Option 2

The automatic bandwidth measurement capability of an instrument may be employed using the X dB bandwidth mode with X set to 6 dB, if the functionality described in 11.8.1 (i.e., RBW = 100 kHz, VBW $\geq 3 \times$ RBW, and peak detector with maximum hold) is implemented by the instrumentation function. When using this capability, care shall be taken so that the bandwidth measurement is not influenced by any intermediate power nulls in the fundamental emission that might be ≥ 6 dB.

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Occupied bandwidth (or 99% emission bandwidth)

- ♦ The transmitter shall be operated at its maximum carrier power measured under normal test conditions.
- ♦ The span of the spectrum analyzer shall be set large enough to capture all products of the modulation process, including the emissions skirts, around the carrier frequency, but small enough to avoid having other emissions (e.g. on adjacent channels) within the span.
- ♦ The detector of the spectrum analyzer shall be set to "Sample". However, a peak, or peak hold, may be used in place of the sampling detector since this usually produces a wider bandwidth than the actual bandwidth (worst-case measurement). Use of a peak hold (or "Max hold") may be necessary to determine the occupied / x dB bandwidth if the device is not transmitting continuously.
- ♦ The resolution bandwidth (RBW) shall be in the range of 1% to 5% of the actual occupied / x dB bandwidth and the video bandwidth (VBW) shall not be smaller than three times the RBW value. Video averaging is not permitted

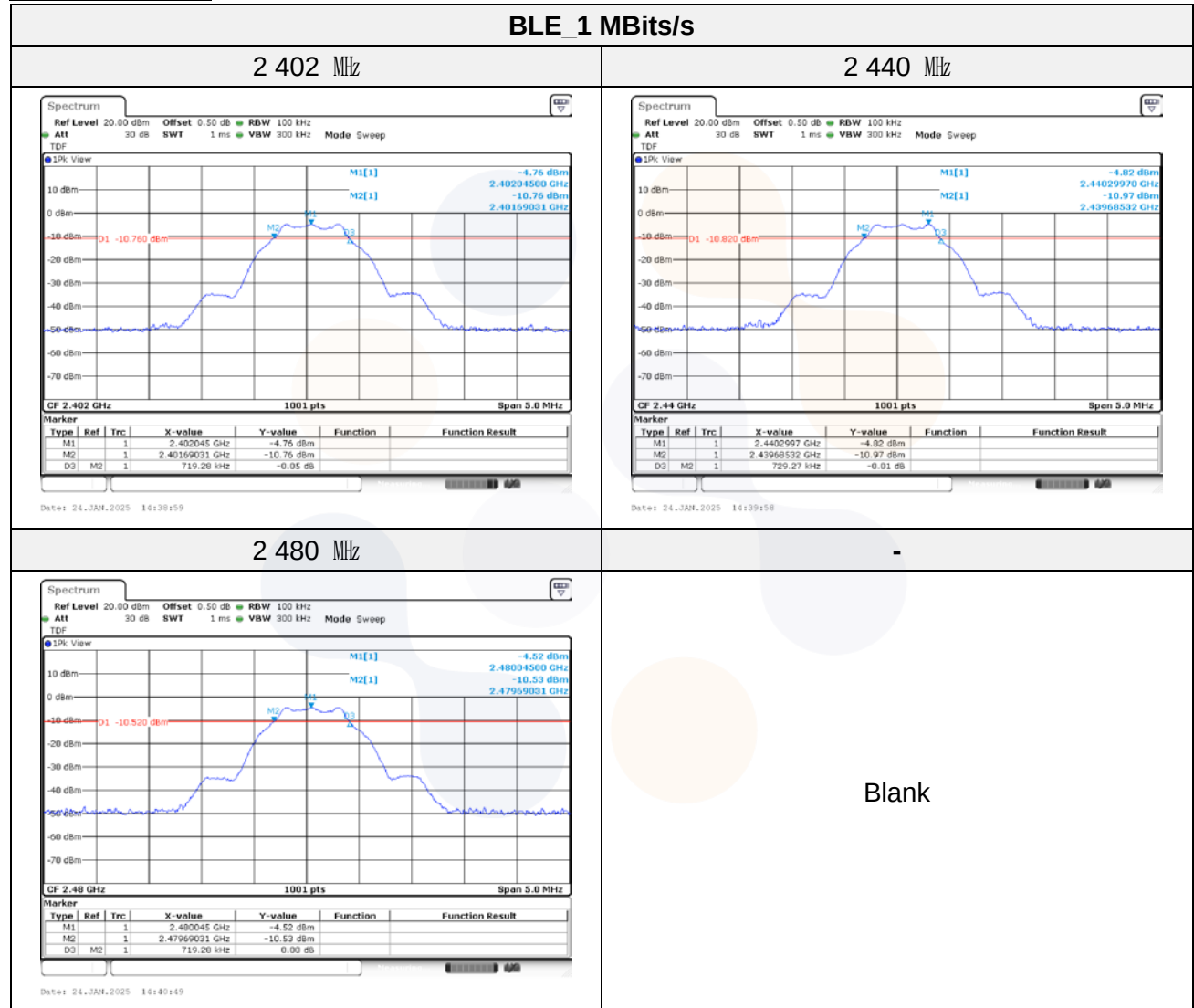
Notes: it may be necessary to repeat the measurement a few times until the RBW and VBW are in compliance with the above requirement.

For the 99% emission bandwidth, the trace data points are recovered and directly summed in linear power level terms. The recovered amplitude data points, beginning at the lowest frequency, are placed in a running sum until 0.5% of the total is reached, and that frequency recorded. The process is repeated for the highest frequency data points (starting at the highest frequency, at the right side of the span, and going down in frequency). This frequency is then recorded. The difference between the two recorded frequencies is the occupied bandwidth (or the 99% emission bandwidth).

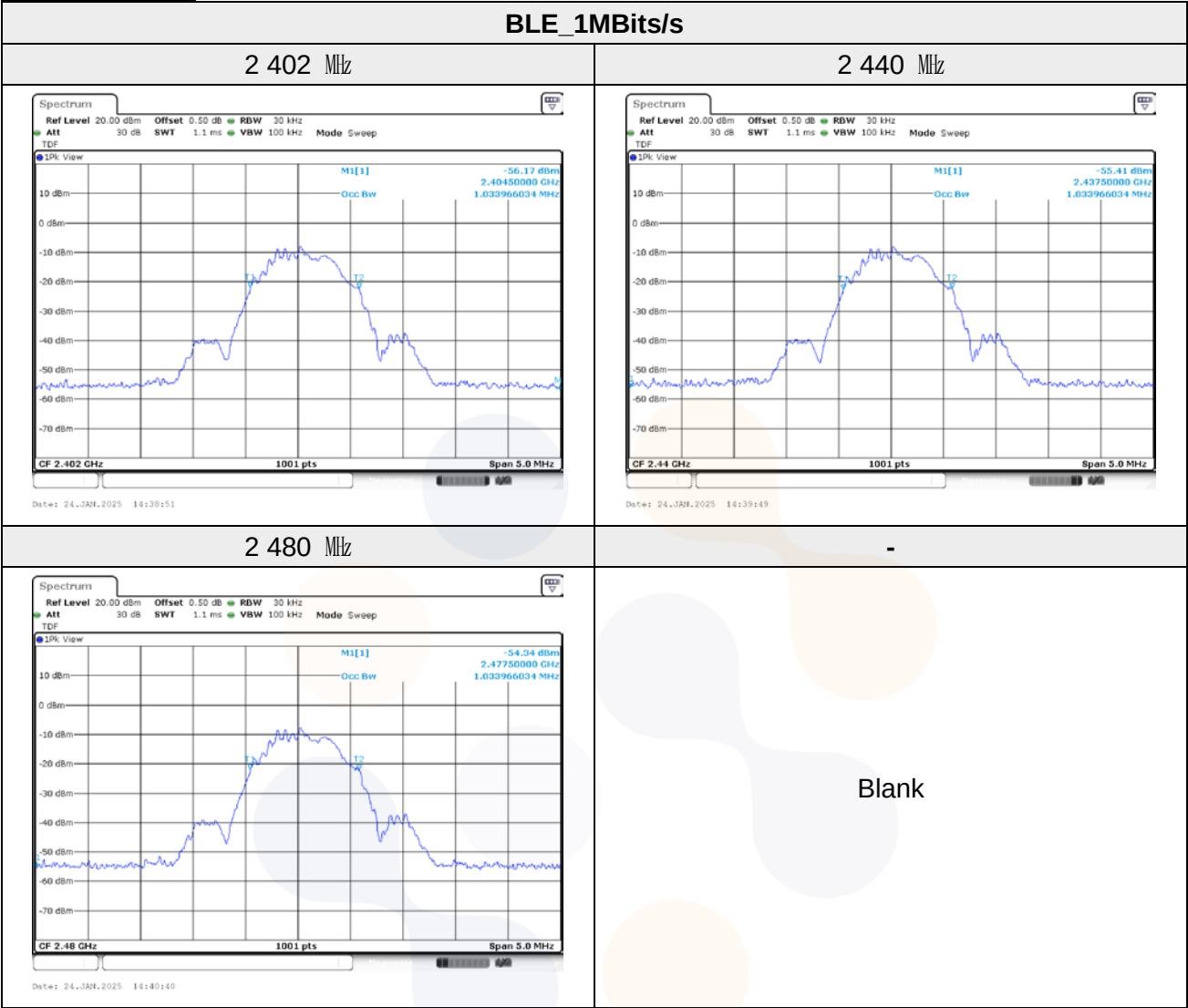
Test results

Frequency(MHz)	Data Rate (Bits/s)	Packet Length (Bytes)	6 dB bandwidth (MHz)	99 % Bandwidth (MHz)
2 402	1M	37	0.719	1.034
2 440			0.729	1.034
2 480			0.719	1.034

6 dB bandwidth



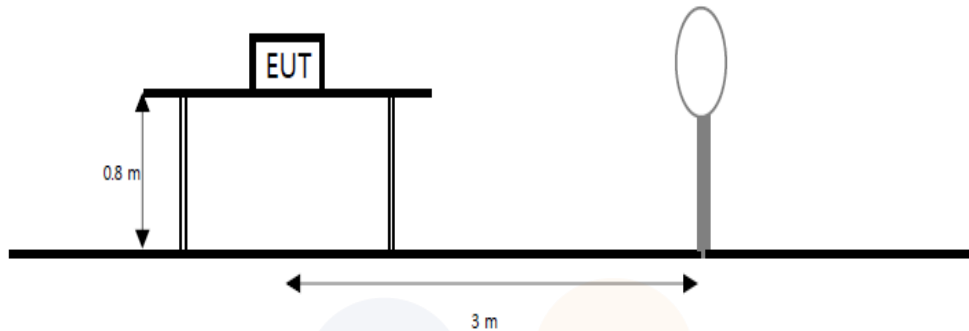
99% bandwidth



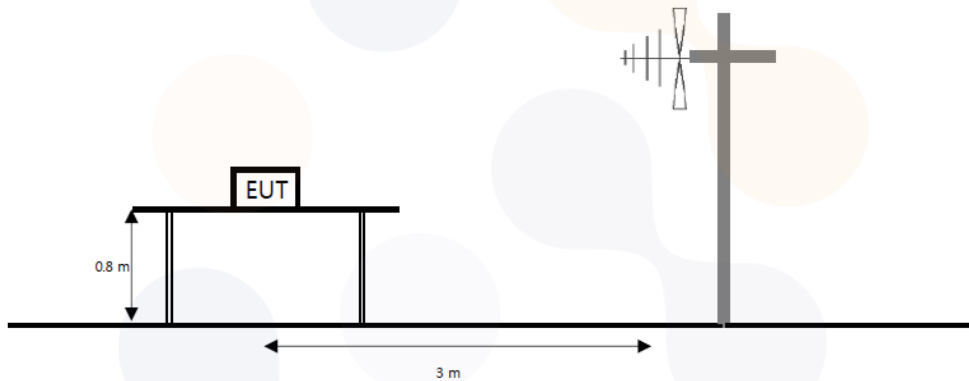
7.4. Spurious Emission, Band Edge and Restricted bands

Test setup

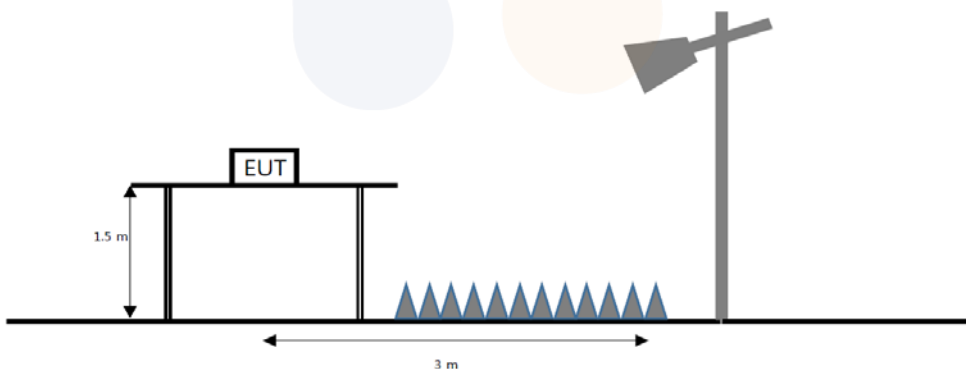
The diagram below shows the test setup that is utilized to make the measurements for emission from 9 kHz to 30 MHz Emissions



The diagram below shows the test setup that is utilized to make the measurements for emission from 30 MHz to 1 GHz emissions.



The diagram below shows the test setup that is utilized to make the measurements for emission from 1 GHz to the tenth harmonic of the highest fundamental frequency or to 40 GHz emissions, whichever is lower.



Limit FCC

According to section 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 ($\mu\text{V}/\text{m}$)	Measurement distance (m)
0.009 - 0.490	2 400/F(kHz)	300
0.490 - 1.705	24 000/F(kHz)	30
1.705 - 30	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., Section 15.231 and 15.241.

According to section 15.205(a) and (b), only spurious emissions are permitted in any of the frequency bands listed below:

MHz	MHz	MHz	GHz
0.009 - 0.110	16.42 - 16.423	399.9 - 410	4.5 - 5.15
0.495 - 0.505	16.694 75 - 16.695 25	608 - 614	5.35 - 5.46
2.173 5 - 2.190 5	16.804 25 - 16.804 75	960 – 1 240	7.25 - 7.75
4.125 - 4.128	25.5 - 25.67	1 300 – 1 427	8.025 - 8.5
4.177 25 - 4.177 75	37.5 - 38.25	1 435 – 1 626.5	9.0 - 9.2
4.207 25 - 4.207 75	73 - 74.6	1 645.5 – 1 646.5	9.3 - 9.5
6.215 - 6.218	74.8 - 75.2	1 660 – 1 710	10.6 - 12.7
6.267 75 - 6.268 25	108 - 121.94	1 718.8 – 1 722.2	13.25 - 13.4
6.311 75 - 6.312 25	123 - 138	2 200 – 2 300	14.47 - 14.5
8.291 - 8.294	149.9 - 150.05	2 310 – 2 390	15.35 - 16.2
8.362 - 8.366	156.524 75 - 156.525 25	2 483.5 – 2 500	17.7 - 21.4
8.376 25 - 8.386 75	25	2 690 – 2 900	22.01 - 23.12
8.414 25 - 8.414 75	156.7 - 156.9	3 260 – 3 267	23.6 - 24.0
12.29 - 12.293	162.012 5 - 167.17	3 332 – 3 339	31.2 - 31.8
12.519 75 - 12.520 25	167.72 - 173.2	3 345.8 – 3 358	36.43 - 36.5
12.576 75 - 12.577 25	240 - 285	3 600 – 4 400	Above 38.6
13.36 - 13.41	322 - 335.4		

The field strength of emissions appearing within these frequency bands shall not exceed the limits shown in section 15.209. At frequencies equal to or less than 1 000 MHz, compliance with the limits in section 15.209 shall be demonstrated using measurement instrumentation employing a CISPR quasi-peak detector. Above 1 000 MHz, compliance with the emission limits in section 15.209 shall be demonstrated based on the average value of the measured emissions. The provisions in section 15.35 apply to these measurements.

IC

According to RSS-247(5.5), In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated device 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 5.4(d), 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.

According to RSS-Gen(8.9), Except where otherwise indicated in the applicable RSS, radiated emissions shall comply with the field strength limits shown in table 5 and table 6. Additionally, the level of any transmitter unwanted emission shall not exceed the level of the transmitter's fundamental emission.

Table 5- General field strength limits at frequencies above 30 MHz

Frequency(MHz)	Field strength ($\mu\text{V/m}$ at 3 m)
30 to 88	100
88 to 216	150
216 to 960	200
Above 960	500

Table 6- General field strength limits at frequencies below 30 MHz

Frequency	Magnetic field strength (H-Field) ($\mu\text{A/m}$)	Measurement distance(m)
9 – 490 kHz ¹⁾	6.37/F (F in kHz)	300
490 – 1 705 kHz	63.7/F (F in kHz)	30
1.705 - 30 MHz	0.08	30

Note 1: The emission limits for the ranges 9-90 kHz and 110-490 kHz are based on measurements employing a linear average detector.

According to RSS-Gen(8.10), Restricted frequency bands, identified in table 7, are designated primarily for safety-of-life services (distress calling and certain aeronautical activities), certain satellite downlinks, radio astronomy and some government uses. Except where otherwise indicated, the following conditions related to the restricted frequency bands apply:

- The transmit frequency, including fundamental components of modulation, of licence-exempt radio apparatus shall not fall within the restricted frequency bands listed in table 7 except for apparatus compliant with RSS-287, Emergency Position Indicating Radio Beacons (EPIRB), Emergency Locator Transmitters (ELT), Personal Locator Beacons (PLB), and Maritime Survivor Locator Devices (MSLD).
- Unwanted emissions that fall into restricted frequency bands listed in table 7 shall comply with the limits specified in table 5 and table 6.
- Unwanted emissions that do not fall within the restricted frequency bands listed in table 7 shall comply either with the limits specified in the applicable RSS or with those specified in table 5 and table 6.

Table 7- Restricted frequency bands*

MHz	MHz	GHz
0.090 - 0.110	149.9 - 150.05	9.0 - 9.2
0.495 - 0.505	156.52475 - 156.52525	9.3 - 9.5
2.1735 - 2.1905	156.7 - 156.9	10.6 - 12.7
3.020 - 3.026	162.0125 - 167.17	13.25 - 13.4
4.125 - 4.128	167.72 - 173.2	14.47 - 14.5
4.17725 - 4.17775	240 - 285	15.35 - 16.2
4.20725 - 4.20775	322 - 335.4	17.7 - 21.4
5.677 - 5.683	399.9 - 410	22.01 - 23.12
6.215 - 6.218	608 - 614	23.6 - 24.0
6.26775 - 6.26825	960 - 1427	31.2 - 31.8
6.31175 - 6.31225	1435 - 1626.5	36.43 - 36.5
8.291 - 8.294	1645.5 - 1646.5	Above 38.6
8.362 - 8.366	1660 - 1710	
8.37625 - 8.38675	1718.8 - 1722.2	
8.41425 - 8.41475	2200 - 2300	
12.29 - 12.293	2310 - 2390	
12.51975 - 12.52025	2483.5 - 2500	
12.57675 - 12.57725	2655 - 2900	
13.36 - 13.41	3260 - 3267	
16.42 - 16.423	3332 - 3339	
16.69475 - 16.69525	3345.8 - 3358	
16.80425 - 16.80475	3500 - 4400	
25.5 - 25.67	4500 - 5150	
37.5 - 38.25	5350 - 5460	
73 - 74.6	7250 - 7750	
74.8 - 75.2	8025 - 8500	
108 - 138	--	

* Certain frequency bands listed in table 7 and in bands above 38.6 GHz are designated for licence-exempt applications. These frequency bands and the requirements that apply to related devices are set out in the 200 and 300 series of RSSs.

Test procedure

ANSI C63.10-2013

Test settings

Peak field strength measurements

1. Analyzer center frequency was set to the frequency of the radiated spurious emission of interest
2. RBW = as specified in table
3. VBW $\geq$ (3 $\times$ RBW)
4. Detector = peak
5. Sweep time = auto
6. Trace mode = max hold
7. Allow sweeps to continue until the trace stabilizes

Table. RBW as a function of frequency

Frequency	RBW
9 kHz to 150 kHz	200 Hz to 300 Hz
0.15 MHz to 30 MHz	9 kHz to 10 kHz
30 MHz to 1 000 MHz	100 kHz to 120 kHz
> 1 000 MHz	1 MHz

Average field strength measurements

Trace averaging with continuous EUT transmission at full power

If the EUT can be configured or modified to transmit continuously ($D \geq 98\%$), then the average emission levels shall be measured using the following method (with EUT transmitting continuously):

1. RBW = 1 MHz (unless otherwise specified).
2. VBW $\geq$ (3 $\times$ RBW).
3. Detector = RMS (power averaging), if $[\text{span} / (\# \text{ of points in sweep})] \leq (\text{RBW} / 2)$. Satisfying this condition may require increasing the number of points in the sweep or reducing the span. If this condition cannot be satisfied, then the detector mode shall be set to peak.
4. Averaging type = power (i.e., rms):
 - 1) As an alternative, the detector and averaging type may be set for linear voltage averaging.
 - 2) Some instruments require linear display mode to use linear voltage averaging. Log or dB averaging shall not be used.
5. Sweep time = auto.
6. Perform a trace average of at least 100 traces.

Trace averaging across ON and OFF times of the EUT transmissions followed by duty cycle correction

If continuous transmission of the EUT ($D \geq 98\%$) cannot be achieved and the duty cycle is constant (duty cycle variations are less than $\pm 2\%$), then the following procedure shall be used:

1. The EUT shall be configured to operate at the maximum achievable duty cycle.
2. Measure the duty cycle D of the transmitter output signal as described in 11.6.
3. RBW = 1 MHz (unless otherwise specified).
4. VBW $\geq [3 \times \text{RBW}]$.
5. Detector = RMS (power averaging), if $[\text{span} / (\# \text{ of points in sweep})] \leq (\text{RBW} / 2)$. Satisfying this condition may require increasing the number of points in the sweep or reducing the span. If this condition cannot be satisfied, then the detector mode shall be set to peak.
6. Averaging type = power (i.e., rms):

Eurofins KCTL Co.,Ltd. 65, Sinwon-ro, Yeongtong-gu, Suwon-si, Gyeonggi-do, 16677, Korea TEL: 82-70-5008-1021 FAX: 82-505-299-8311 www.kctl.co.kr	Report No.: KR25-SRF0091-B Page (24) of (37)	
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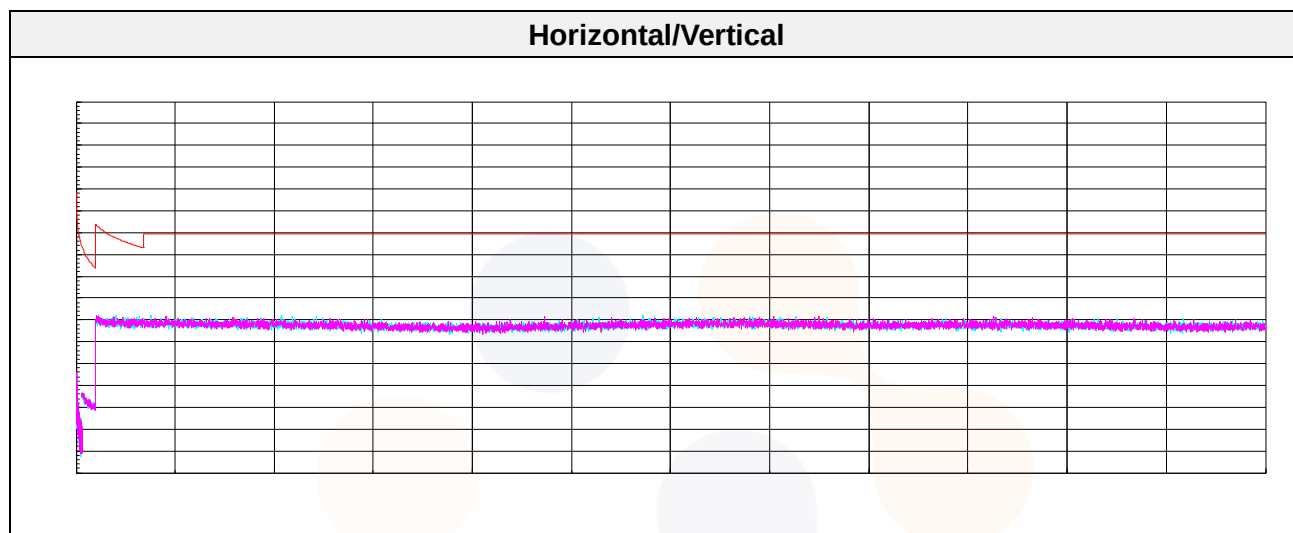
- 1) As an alternative, the detector and averaging type may be set for linear voltage averaging.
- 2) Some instruments require linear display mode to use linear voltage averaging. Log or dB averaging shall not be used.
7. Sweep time = auto.
8. Perform a trace average of at least 100 traces.
9. A correction factor shall be added to the measurement results prior to comparing with the emission limit to compute the emission level that would have been measured had the test been performed at 100% duty cycle. The correction factor is computed as follows:
 - 1) If power averaging (rms) mode was used in step f), then the applicable correction factor is $[10 \log (1 / D)]$, where D is the duty cycle.
 - 2) If linear voltage averaging mode was used in step f), then the applicable correction factor is $[20 \log (1 / D)]$, where D is the duty cycle.
 - 3) If a specific emission is demonstrated to be continuous ($D \geq 98\%$) rather than turning ON and OFF with the transmit cycle, then no duty cycle correction is required for that emission.

Notes:

1. $f < 30$ MHz, extrapolation factor of 40 dB/decade of distance. $F_d = 40 \log(D_m/D_s)$
 $f \geq 30$ MHz, extrapolation factor of 20 dB/decade of distance. $F_d = 20 \log(D_m/D_s)$
Where:
 F_d = Distance factor in dB
 D_m = Measurement distance in meters
 D_s = Specification distance in meters
2. Factors(dB) = Antenna factor(dB/m) + Cable loss(dB) + or Amp. gain(dB) + or F_d (dB)
3. The worst-case emissions are reported however emissions whose levels were not within 20 dB of respective limits were not reported.
4. Average test would be performed if the peak result were greater than the average limit.
5. ¹⁾ means restricted band.
6. Below 30 MHz frequency range, In order to search for the worst result, all orientations about parallel, perpendicular, and ground-parallel were investigated then reported. when the emission level was higher than 20 dB of the limit, then the following statement shall be made: "No spurious emissions were detected within 20 dB of the limit."
7. The limits in CFR 47, Part 15, Subpart C, paragraph 15.209 (a), are identical to those in RSS-GEN Section 8.9, Table 6, since the measurements are performed in terms of magnetic field strength and converted to electric field strength levels (as reported in the table) using the free space impedance of 377Ω. For example, the measurement frequency X kHz resulted in a level of Y dBμV/m, which is equivalent to $Y - 51.5 = Z$ dBμA/m, which has the same margin, W dB, to the corresponding RSS-GEN Table 6 limit as it has to be 15.209(a) limit.

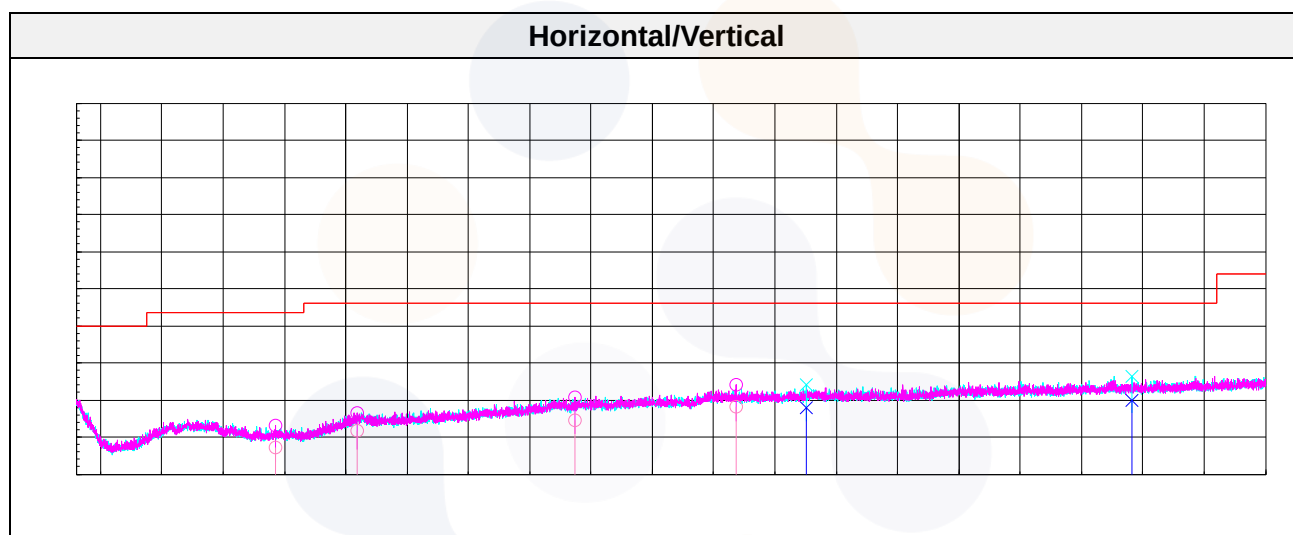
Test results (Below 30 MHz) –Worst case: 1 MBits/s(37 Bytes) 2 480 MHz

Frequency	Pol.	Reading	Antenna Factor	Amp. + Cable	DCF	Result	Limit	Margin
(MHz)	(V/H)	(dB(μV))	(dB)	(dB)	(dB)	(dB(μV/m))	(dB(μV/m))	(dB)
Quasi peak data								
No spurious emissions were detected within 20 dB of the limit.								



Test results (Below 1 000 MHz) – Worst case: 1 MBits/s(37 Bytes) 2 480 MHz

Frequency	Pol.	Reading	Antenna Factor	Amp. + Cable	DCF	Result	Limit	Margin
(MHz)	(V/H)	(dB(μV))	(dB)	(dB)	(dB)	(dB(μV/m))	(dB(μV/m))	(dB)
Quasi peak data								
192.96	H	23.00	15.20	-31.12	-	7.08	43.52	36.44
259.16 ¹⁾	H	23.20	19.52	-31.06	-	11.66	46.02	34.36
436.67	H	22.50	22.50	-30.62	-	14.38	46.02	31.64
568.59	H	24.40	24.60	-30.69	-	18.31	46.02	27.71
625.82	V	23.60	24.89	-30.51	-	17.98	46.02	28.04
890.88	V	22.30	26.44	-28.92	-	19.82	46.02	26.20



Test results (Above 1 000 MHz)_1 Mbits/s(37 Bytes)

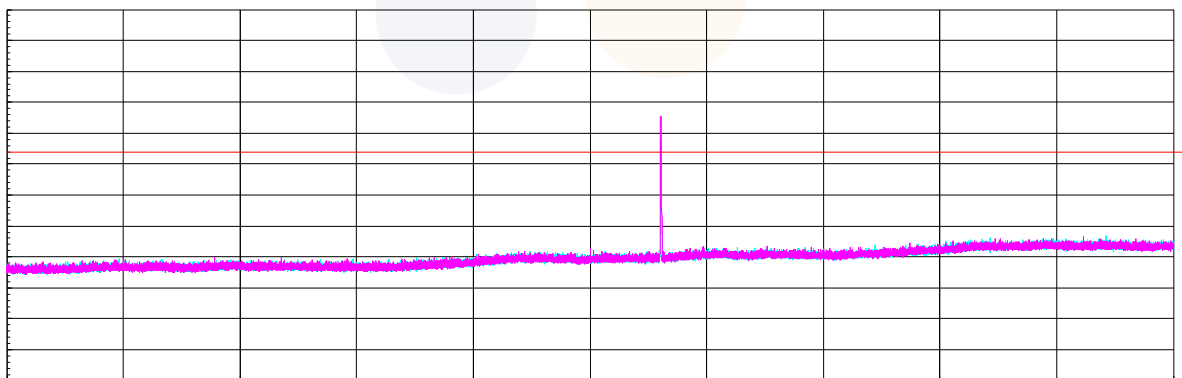
2 402 MHz

Frequency	Pol.	Reading	Antenna Factor	Amp. + Cable	DCF	Result	Limit	Margin
[MHz]	[V/H]	[dB(μV)]	[dB]	[dB]	[dB]	[dB(μV/m)]	[dB(μV/m)]	[dB]
Peak data								
2 361.06 ¹⁾	V	43.90	27.10	-30.38	-	40.62	74.00	33.38
4 831.10 ¹⁾	V	54.80	32.49	-43.71	-	43.58	74.00	30.42
7 242.93	H	52.00	36.97	-41.36	-	47.61	74.00	26.39
Average Data								
No spurious emissions were detected within 20 dB of the limit.								

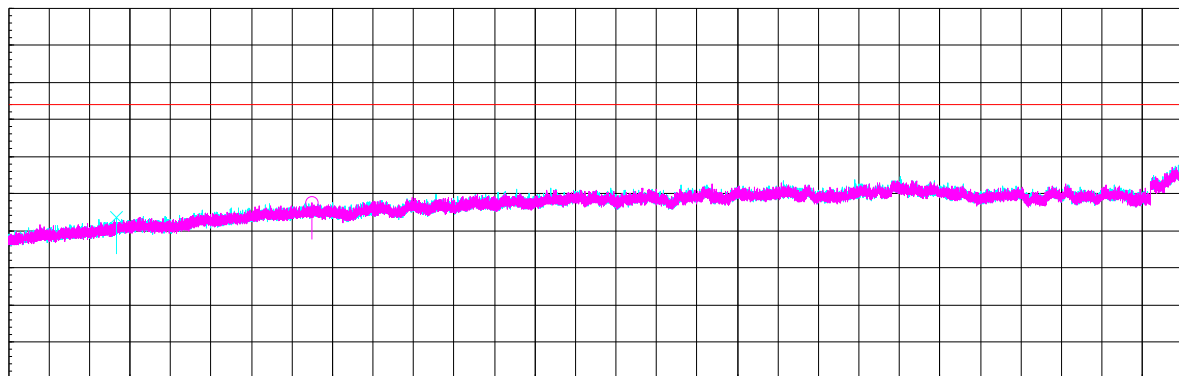
Horizontal/Vertical for Band-edge



Horizontal/Vertical for 1 GHz ~ 3.5 GHz



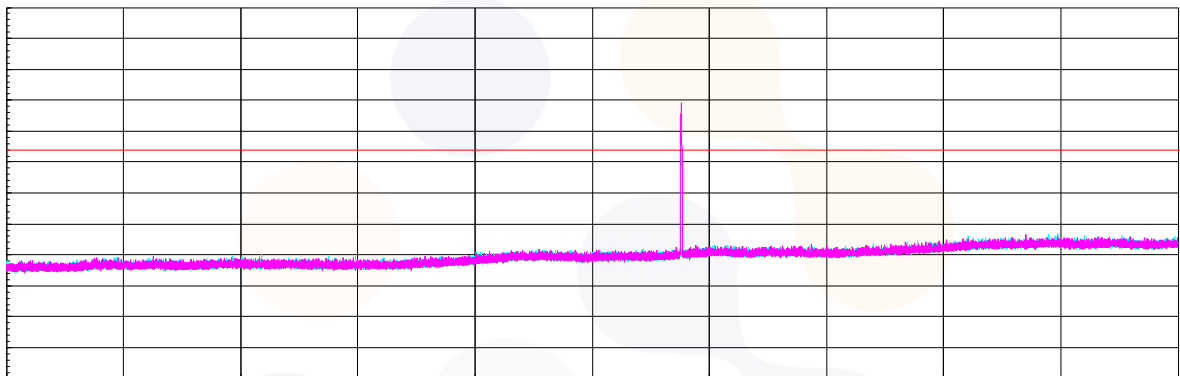
Horizontal/Vertical for 3.5 GHz ~ 18 GHz



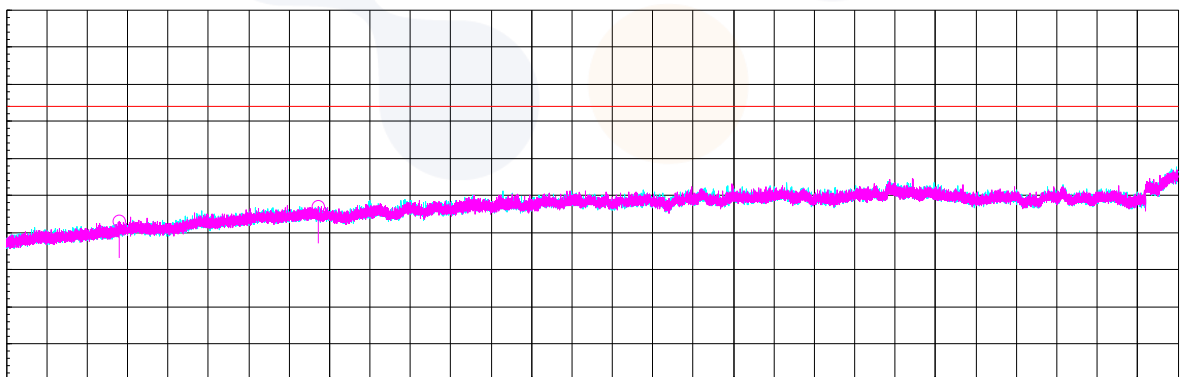
2 440 MHz

Frequency	Pol.	Reading	Antenna Factor	Amp. + Cable	DCF	Result	Limit	Margin
[MHz]	[V/H]	[dB(μV)]	[dB]	[dB]	[dB]	[dB(μV/m)]	[dB(μV/m)]	[dB]
Peak data								
4 901.67 ¹⁾	H	53.40	32.81	-43.39	-	42.82	74.00	31.18
7 366.67 ¹⁾	H	51.60	36.57	-41.36	-	46.81	74.00	27.19
Average Data								
No spurious emissions were detected within 20 dB of the limit.								

Horizontal/Vertical for 1 GHz ~ 3.5 GHz



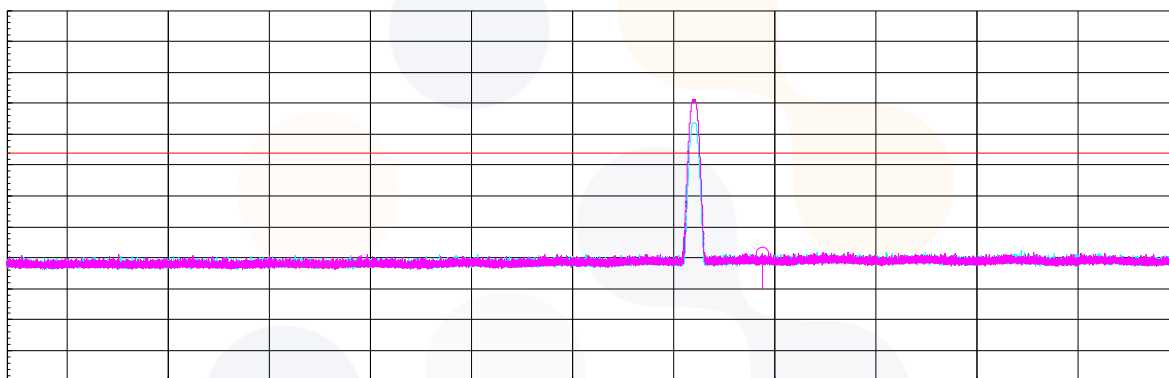
Horizontal/Vertical for 3.5 GHz ~ 18 GHz



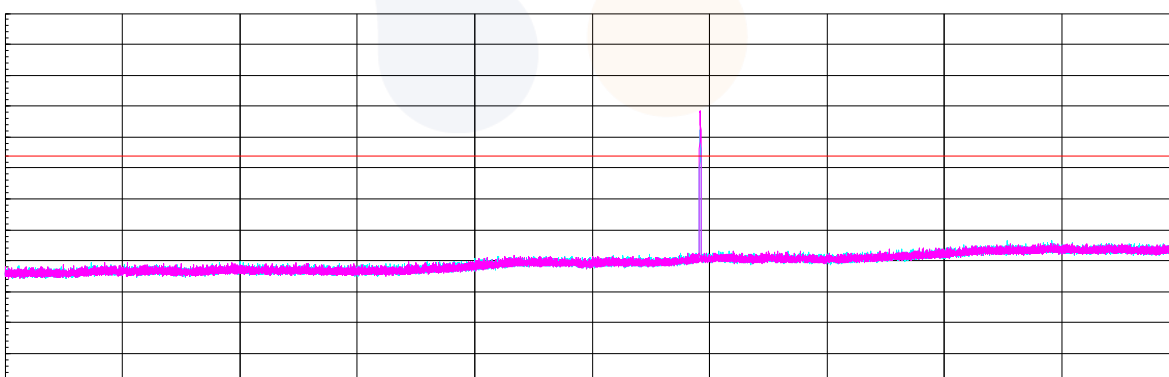
2 480 MHz

Frequency	Pol.	Reading	Antenna Factor	Amp. + Cable	DCF	Result	Limit	Margin
[MHz]	[V/H]	[dB(μV)]	[dB]	[dB]	[dB]	[dB(μV/m)]	[dB(μV/m)]	[dB]
Peak data								
2 496.96 ¹⁾	H	43.50	27.97	-30.24	-	41.23	74.00	32.77
4 920.03 ¹⁾	H	53.70	32.88	-43.32	-	43.26	74.00	30.74
7 413.07 ¹⁾	H	52.90	36.47	-41.42	-	47.95	74.00	26.05
Average Data								
No spurious emissions were detected within 20 dB of the limit.								

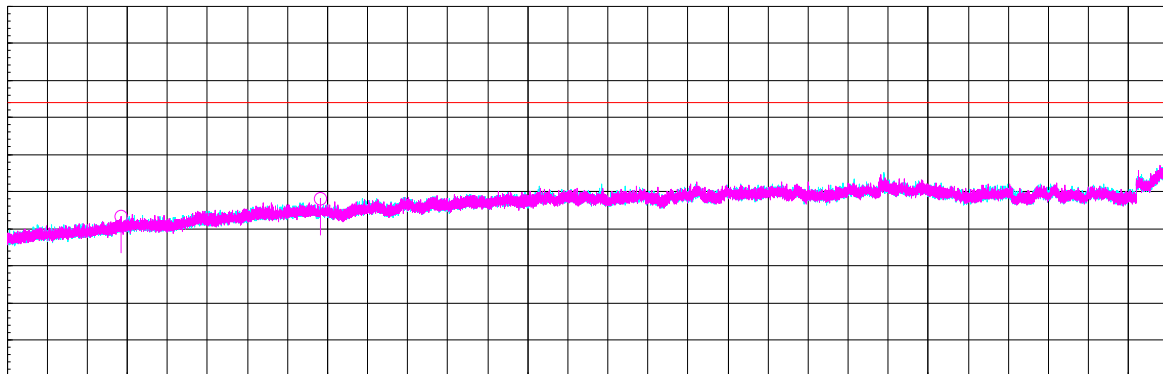
Horizontal/Vertical for Band-edge



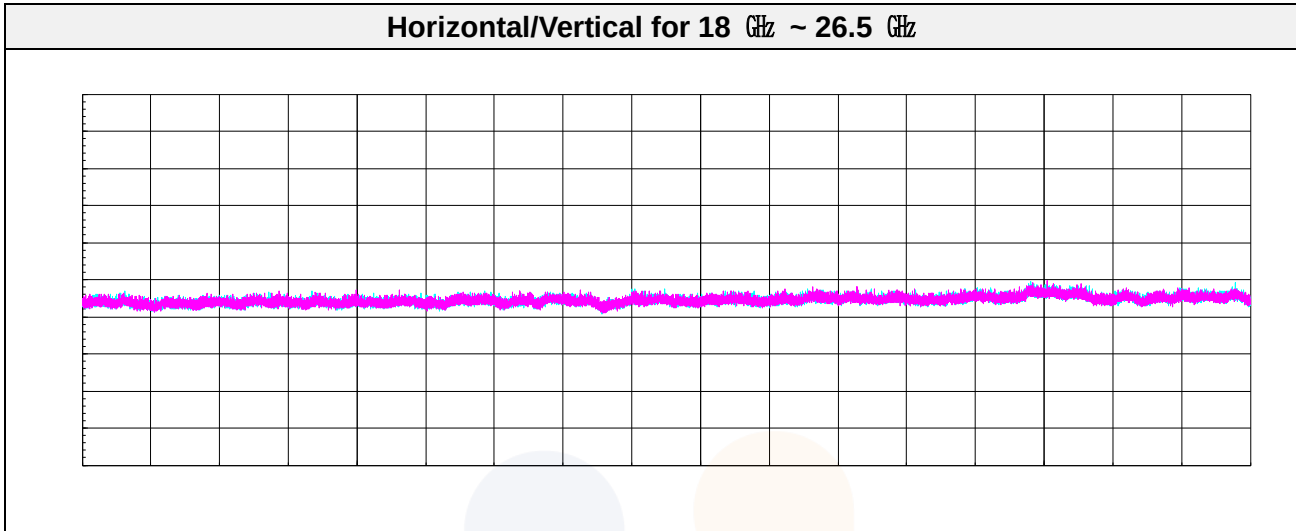
Horizontal/Vertical for 1 GHz ~ 3.5 GHz



Horizontal/Vertical for 3.5 GHz ~ 18 GHz



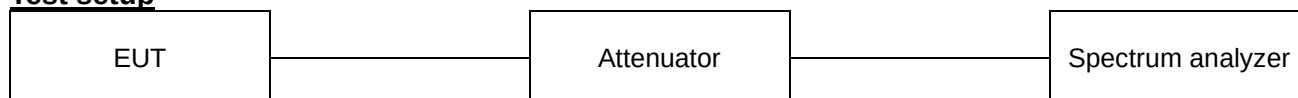
Test results (Above 18 GHz) – Worst Case : 1 MBits/s(37 Bytes) 2 480 MHz



Note: The Worst case was based on the lowest margin condition considering Harmonic and Spurious Emission.

7.5. Conducted Spurious Emission

Test setup



Limit

According to §15.247(d) and RSS-247(5.5), In any 100 kHz bandwidth outside the frequency band in which the spread spectrum or digitally modulated intentional radiator is operation, 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 averaging over a time interval, as permitted under paragraph (b)(3) of this section, the attenuation specified in §15.209(a) is not required. In addition, radiated emission limits specified in §15.209(a) (see §15.205(c)).

Limit : 20 dBc

Test procedure

ANSI C63.10-2013 - Section 11.11.3

KDB 558074 D01 v05 - Section 8.5

KDB 662911 D01 v02r01 – section (E)(3)(b)

Test settings

Establish an emission level by using the following procedure:

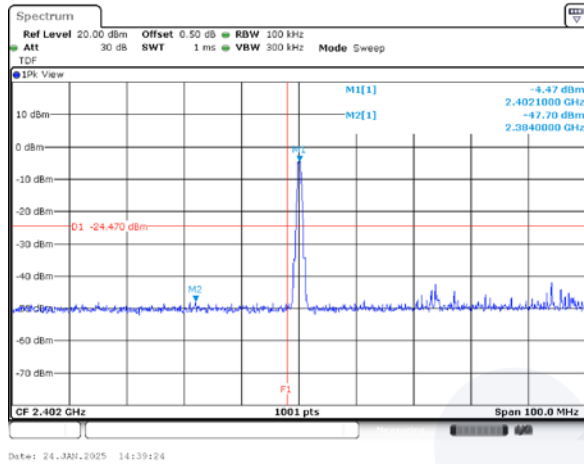
- 1) Set the center frequency and span to encompass frequency range to be measured.
- 2) Set the RBW = 100 kHz
- 3) Set the VBW $\geq [3 \times \text{RBW}]$
- 4) Detector = peak
- 5) Sweep time = auto couple
- 6) Trace mode = max hold
- 7) Allow trace to fully stabilize.
- 8) Use the peak marker function to determine the maximum amplitude level.

Ensure that the amplitude of all unwanted emissions outside of the authorized frequency band (excluding restricted frequency bands) is attenuated by at least the minimum requirements specified in 11.11. Report the three highest emissions relative to the limit.

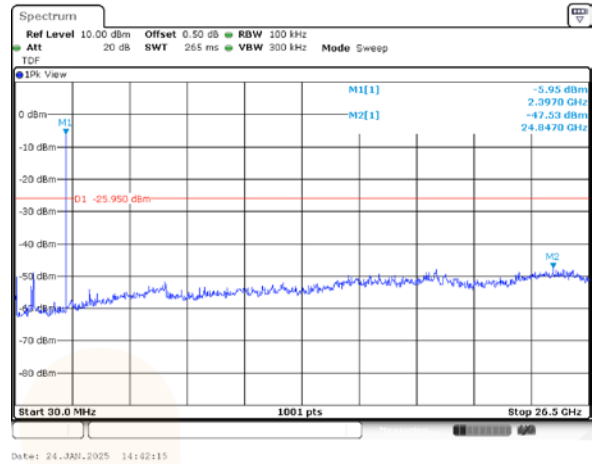
Test results

BLE_1 MBit/s(37 Bytes)

Conducted band-edge / Low ch.



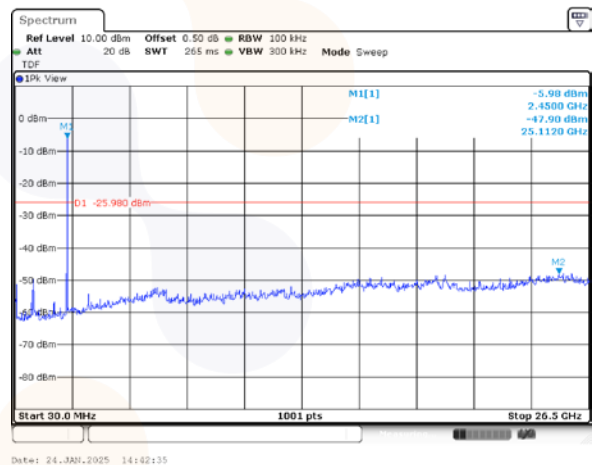
Conducted spurious / Low ch.



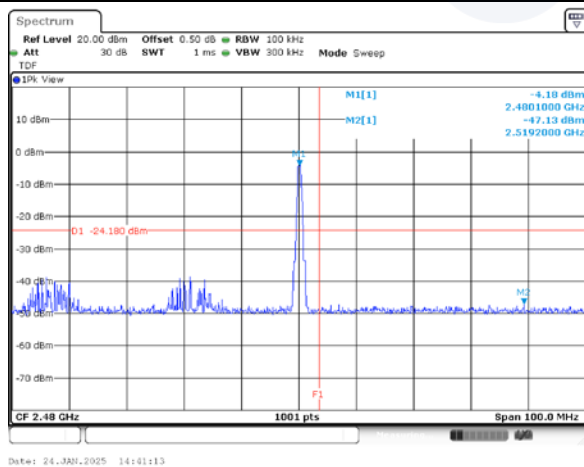
Conducted band-edge / Mid ch.

Blank

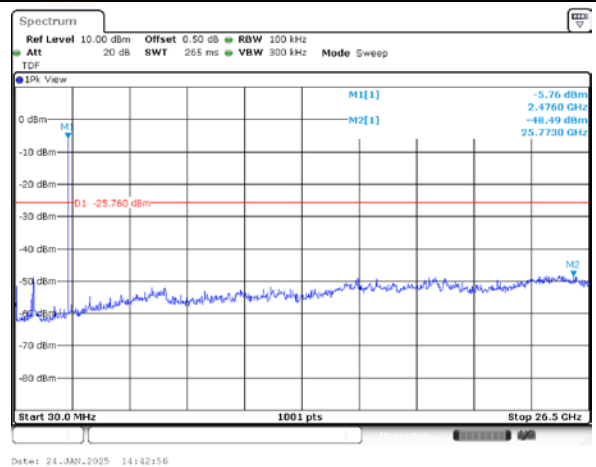
Conducted spurious / Mid ch.



Conducted band-edge / High ch.

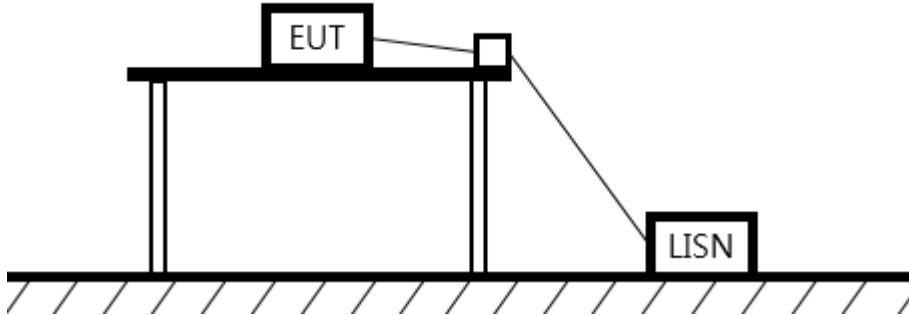


Conducted spurious / High ch.



7.6. AC Conducted emission

Test setup



Limit

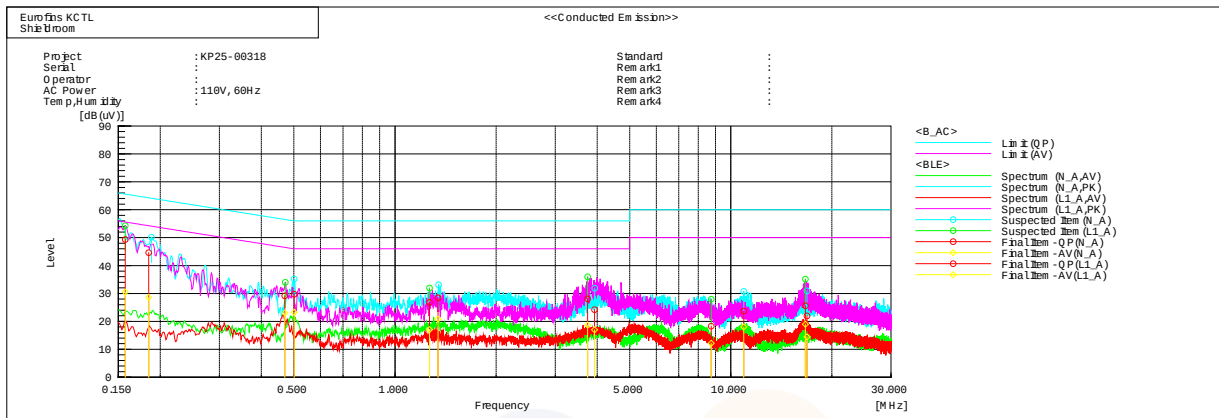
According to 15.207(a) and RSS-Gen(8.8), for an intentional radiator that is designed to be connected to the public utility (AC) power line, the radio frequency voltage that is conducted back onto the AC power line on any frequency or frequencies, within the band 150 kHz to 30 MHz, shall not exceed the limits in the following table, as measured using a 50 μ H/50 ohm line impedance stabilization network (LISN). Compliance with the provision of this paragraph shall on the measurement of the radio frequency voltage between each power line and ground at the power terminal. The lower applies at the boundary between the frequencies ranges.

Frequency of Emission (MHz)	Conducted limit (dB μ V/m)	
	Quasi-peak	Average
0.15 – 0.50	66 - 56*	56 - 46*
0.50 – 5.00	56	46
5.00 – 30.0	60	50

Measurement procedure

1. The EUT was placed on a wooden table of size, 1 m by 1.5 m, raised 80 cm in which is located 40 cm away from the vertical wall and 1.5m away from the side wall of the shielded room.
2. Each current-carrying conductor of the EUT power cord was individually connected through a 50 Ω /50 μ H LISN, which is an input transducer to a spectrum analyzer or an EMI/Field Intensity Meter, to the input power source.
3. Exploratory measurements were made to identify the frequency of the emission that had the highest amplitude relative to the limit by operating the EUT in a range of typical modes of operation, cable position, and with a typical system equipment configuration and arrangement. Based on the exploratory tests of the EUT, the one EUT cable configuration and arrangement and mode of operation that had produced the emission with the highest amplitude relative to the limit was selected for the final measurement.
4. The final test on all current-carrying conductors of all of the power cords to the equipment that comprises the EUT (but not the cords associated with other non-EUT equipment is the system) was then performed over the frequency range of 0.15 MHz to 30 MHz.
5. The measurements were made with the detector set to peak amplitude within a bandwidth of 10 kHz or to quasi-peak and average within a bandwidth of 9 kHz. The EUT was in transmitting mode during the measurements.

Test results-Worst case: 1 MBits/s(37 Bytes) 2 480 MHz



Final Result

--- N_A Phase ---

No.	Frequency [MHz]	Reading QP [dB(uV)]	Reading CAV [dB(uV)]	c.f [dB]	Result QP [dB(uV)]	Result CAV [dB(uV)]	Limit QP [dB(uV)]	Limit AV [dB(uV)]	Margin QP [dB]	Margin CAV [dB]
1	0.18483	34.5	18.5	10.1	44.6	28.6	64.3	54.3	19.7	25.7
2	0.50091	19.6	13.1	10.1	29.7	23.2	56.0	46.0	26.3	22.8
3	1.34344	18.5	10.9	9.9	28.4	20.8	56.0	46.0	27.6	25.2
4	3.93071	14.3	7.1	9.9	24.2	17.0	56.0	46.0	31.8	29.0
5	10.93603	13.1	7.4	10.6	23.7	18.0	60.0	50.0	36.3	32.0
6	16.86218	11.1	3.5	10.9	22.0	14.4	60.0	50.0	38.0	35.6

--- L1_A Phase ---

No.	Frequency [MHz]	Reading QP [dB(uV)]	Reading CAV [dB(uV)]	c.f [dB]	Result QP [dB(uV)]	Result CAV [dB(uV)]	Limit QP [dB(uV)]	Limit AV [dB(uV)]	Margin QP [dB]	Margin CAV [dB]
1	0.15731	39.3	20.5	10.0	49.3	30.5	65.6	55.6	16.3	25.1
2	0.46981	19.0	12.9	10.1	29.1	23.0	56.5	46.5	27.4	23.5
3	1.26703	16.9	7.1	9.9	26.8	17.0	56.0	46.0	29.2	29.0
4	3.74681	18.2	8.7	9.9	28.1	18.6	56.0	46.0	27.9	27.4
5	8.74645	7.8	1.8	10.4	18.2	12.2	60.0	50.0	41.8	37.8
6	16.67318	14.7	8.1	10.9	25.6	19.0	60.0	50.0	34.4	31.0

8. Measurement equipment

Equipment Name	Manufacturer	Model No.	Serial No.	Next Cal. Date
Spectrum Analyzer	R&S	FSV30	100914	25.07.02
Signal Generator	R&S	SMB100A	176206	26.01.17
Vector Signal Generator	R&S	SMBV100A	257566	25.07.01
Attenuator	API Inmet	40AH2W-10	17	25.04.30
Controller	INNCO SYSTEMS	CO3000	1442/54370322/P	N/A
Antenna Mast	INNCO SYSTEMS	MA4640-XP-ET	N/A	N/A
Turn Device	INNCO SYSTEMS	DS1200-S-1t	N/A	N/A
Spectrum Analyzer	R&S	FSV40	100988	25.05.27
Broadband PreAmplifier	SCHWARZBECK	BBV9718D	53	26.01.16
Low Noise Amplifier	TESTEK	TK-PA18H	220123-L	25.10.11
Horn Antenna	SCHWARZBECK	BBHA9120D	2764	25.10.24
High Pass Filter	Wainwright Instruments GmbH	WHKX12-2805-3000-18000-40SS	SN59	25.10.15
Low Noise Amplifier	TESTEK	TK-PA1840H	220234-L	25.10.14
Horn Antenna	SCHWARZBECK	BBHA9170	1266	25.10.15
High Pass Filter	Qotana	DBHF058004000A	23041800061	25.06.24
Amplifier	SONOMA INSTRUMENT	310N	421910	26.01.17
Bilog Antenna	Teseq GmbH	CBL 6112D	61521	26.12.11
Loop Antenna	R&S	HFH2-Z2	100355	26.06.25
TWO-LINE V - NETWORK	R&S	ENV216	101358	25.10.13
EMI TEST RECEIVER	R&S	ESCI3	101428	25.08.12
Controller	INNCO SYSTEMS	CO3000	1441/54370322/P	-
Antenna Mast	INNCO SYSTEMS	MA4640-XP-ET	AM003	-
Turn Device	INNCO SYSTEMS	DS1200-S-1t	0003	-
Spectrum Analyzer	R&S	FSVA40	101575	25.04.24
Broadband PreAmplifier	SCHWARZBECK	BBV9718D	57	26.01.16
Low Noise Amplifier	TESTEK	TK-PA18H	220124-L	25.10.11
Horn Antenna	SCHWARZBECK	BBHA9120D	2763	25.10.24
High Pass Filter	Wainwright Instruments GmbH	WHKX12-2805-3000-18000-40SS	SN58	25.10.15

End of test report