

TEST REPORT

Test report no.: 1-6634_23-01-16-D



Testing laboratory

cetecom advanced GmbH

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Accredited Testing Laboratory:

The testing laboratory (area of testing) is accredited according to DIN EN ISO/IEC 17025 (2018-03) by the Deutsche Akkreditierungsstelle GmbH (DAkkS).

The accreditation is valid for the scope of testing procedures as stated in the accreditation certificate with the registration number:

D-PL-12047-01-00.

ISED Testing Laboratory Recognized Listing Number: DE0001

FCC designation number: DE0002

Applicant

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Manufacturer

Cochlear Limited

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Macquarie University NSW 2109 / AUSTRALIA

Test standard/s

FCC - Title 47 CFR Part 15 FCC - Title 47 of the Code of Federal Regulations; Chapter I; Part 15 - Radio frequency devices

RSS - 210 Issue 11 Spectrum Management and Telecommunications Radio Standards Specification - Licence-Exempt Radio Apparatus: Category I Equipment

For further applied test standards please refer to section 3 of this test report.

Test Item

Kind of test item: **Sound Processor in a Cochlear Implant System**

Model name: **CP1175**

FCC ID: **WTO-CP1175**

ISED certification number: **8039A-CP1175**

Frequency: **5.01MHz**

Technology tested: **5 MHz Inductive Link**

Antenna: **N/A**

Power supply: **3.7V (nominal)**

Temperature: **22°C**

This test report is electronically signed and valid without handwritten signature. For verification of the electronic signatures, the public keys can be requested at the testing laboratory.

Test report authorized:

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Christoph Schneider
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On behalf of

Hans-Joachim Wolsdorfer
Lab Manager
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2 General information

2.1 Notes and disclaimer

The test results of this test report relate exclusively to the test item specified in this test report. cetecom advanced GmbH does not assume responsibility for any conclusions and generalizations drawn from the test results with regard to other specimens or samples of the type of the equipment represented by the test item.

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This test report replaces the test report with the number 1-6634_23-01-16_C and dated 2024-10-02.

2.2 Application details

Date of receipt of order:	2023-08-04
Date of receipt of test item:	2023-08-17
Start of test:*	2023-08-18
End of test:*	2024-10-02
Person(s) present during the test:	-/-

*Date of each measurement, if not shown in the plot, can be requested. Dates are stored in the measurement software.

2.3 Test laboratories sub-contracted

None

3 Test standard/s, references and accreditations

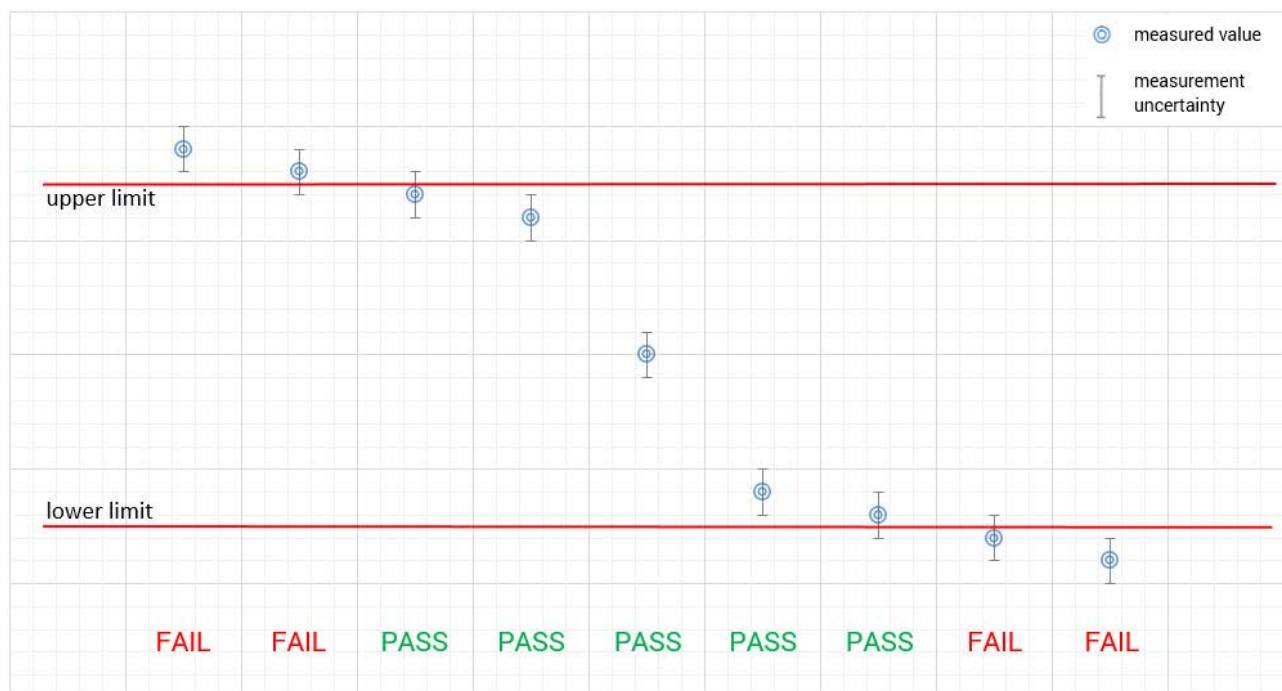
Test standard	Date	Description
FCC - Title 47 CFR Part 15		FCC - Title 47 of the Code of Federal Regulations; Chapter I; Part 15 - Radio frequency devices
RSS - 210 Issue 11	June 2024	Spectrum Management and Telecommunications Radio Standards Specification - Licence-Exempt Radio Apparatus: Category I Equipment
RSS - Gen Issue 5 incl. Amendment 1 & 2	February 2021	Spectrum Management and Telecommunications Radio Standards Specification - General Requirements for Compliance of Radio Apparatus
Guidance	Version	Description
ANSI C63.4-2014	-/-	American National Standard for Methods of Measurement of Radio-Noise Emissions from Low-Voltage Electrical and Electronic Equipment in the Range of 9 kHz to 40 GHz
ANSI C63.10-2013	-/-	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices

4 Reporting statements of conformity – decision rule

Only the measured values related to their corresponding limits will be used to decide whether the equipment under test meets the requirements of the test standards listed in chapter 3.

The measurement uncertainty is mentioned in this test report, see chapter 9, but is not taken into account - neither to the limits nor to the measurement results. Measurement results with a smaller margin to the corresponding limits than the measurement uncertainty have a potential risk of more than 5% that the decision might be wrong."

measured value, measurement uncertainty, verdict



5 Test environment

Temperature	:	T _{nom}	+22 °C all tests performed at room temperature
Relative humidity content	:		55 %
Barometric pressure	:		1021 hpa
Power supply	:	V _{nom}	3.7 V (nominal)

6 Test item

6.1 General description

Kind of test item	:	Sound Processor in a Cochlear Implant System	
Model name	:	CP1175	
HMN	:	-/-	
PMN	:	CP1175	
HVIN	:	CP1175	
FVIN	:	-/-	
S/N serial number	:	Rad.	1010201004762
Hardware status	:	Build Y	
Software status	:	N/A	
Firmware status	:	1224A00!00#1111527	
Frequency	:	5.01MHz	
Type of radio transmission	:	modulated carrier	
Use of frequency spectrum	:		
Type of modulation	:	proprietary	
Number of channels	:	1	
Antenna	:	N/A	
Power supply	:	3.7V (nominal)	
Temperature	:	22°C	

6.2 Additional information

The content of the following annexes is defined in the QA. It may be that not all of the listed annexes are necessary for this report, thus some values in between may be missing.

Test setup and EUT photos are included in test report:

- 1-6634_23-01-01_AnnexA
- 1-6634_23-01-01_AnnexB
- 1-6634_23-01-01_AnnexD

7 Description of the test setup

Typically, the calibrations of the test apparatus are commissioned to and performed by an accredited calibration laboratory. The calibration intervals are determined in accordance with the DIN EN ISO/IEC 17025. In addition to the external calibrations, the laboratory executes comparison measurements with other calibrated test systems or effective verifications. Weekly chamber inspections and range calibrations are performed. Where possible, RF generating and signaling equipment as well as measuring receivers and analyzers are connected to an external high-precision 10 MHz reference (GPS-based or rubidium frequency standard).

In order to simplify the identification of the equipment used at some special tests, some items of test equipment and ancillaries can be provided with an identifier or number in the equipment list below (Lab/Item).

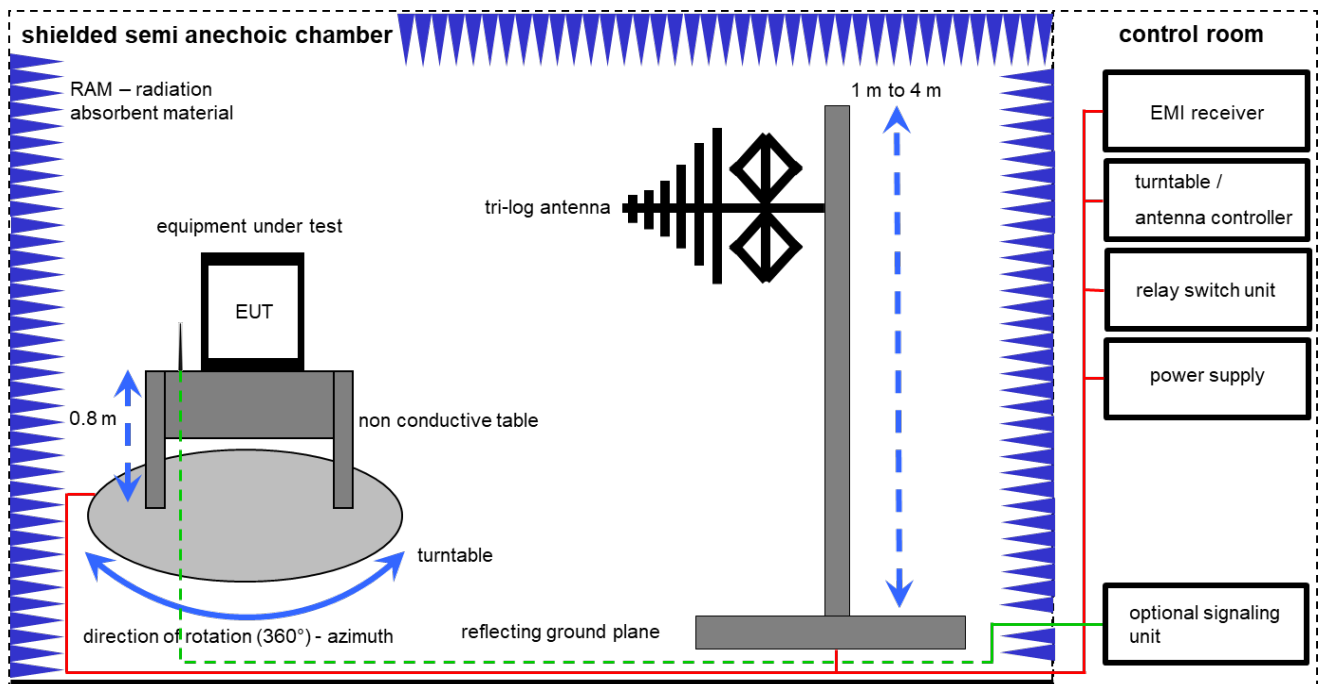
Each block diagram listed can contain several test setup configurations. All devices belonging to a test setup are identified with the same letter syntax. For example: Column Setup and all devices with an A.

Agenda: Kind of Calibration

k	calibration / calibrated	EK	limited calibration
ne	not required (k, ev, izw, zw not required)	zw	cyclical maintenance (external cyclical maintenance)
ev	periodic self verification	izw	internal cyclical maintenance
Ve	long-term stability recognized	g	blocked for accredited testing
vlk!	Attention: extended calibration interval		
NK!	Attention: not calibrated	*)	next calibration ordered / currently in progress

7.1 Shielded semi anechoic chamber

The radiated measurements are performed in vertical and horizontal plane in the frequency range from 30 MHz to 1 GHz in semi-anechoic chambers. The EUT is positioned on a non-conductive support with a height of 0.80 m above a conductive ground plane that covers the whole chamber. The receiving antennas are conform to specifications ANSI C63. These antennas can be moved over the height range between 1.0 m and 4.0 m in order to search for maximum field strength emitted from EUT. The measurement distances between EUT and receiving antennas are indicated in the test setups for the various frequency ranges. For each measurement, the EUT is rotated in all three axes until the maximum field strength is received. The wanted and unwanted emissions are received by spectrum analyzers where the detector modes and resolution bandwidths over various frequency ranges are set according to requirement ANSI C63.



Measurement distance: tri-log antenna 10 meter
EMC32 software version: 10.59.00

FS = UR + CL + AF
(FS-field strength; UR-voltage at the receiver; CL-loss of the cable; AF-antenna factor)

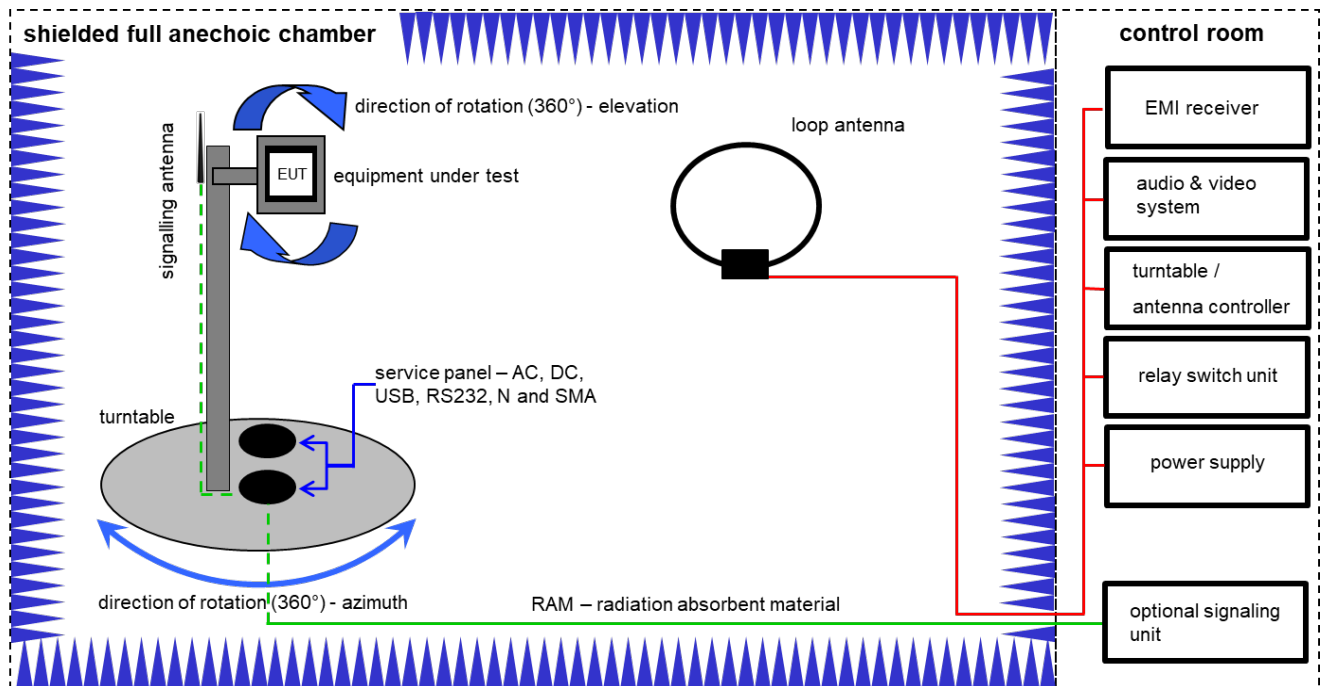
Example calculation:

FS [dB μ V/m] = 12.35 [dB μ V/m] + 1.90 [dB] + 16.80 [dB/m] = 31.05 [dB μ V/m] (35.69 μ V/m)

Equipment table:

No.	Setup	Equipment	Type	Manufacturer	Serial No.	INV. No.	Kind of Calibration	Last Calibration	Next Calibration
1	A	Semi anechoic chamber	3000023	MWB AG	-/-	300000551	ne	-/-	-/-
2	A	Antenna Tower	Model 2175	ETS-Lindgren	64762	300003745	izw	-/-	-/-
3	A	Positioning Controller	Model 2090	ETS-Lindgren	64672	300003746	izw	-/-	-/-
4	A	Turntable Interface-Box	Model 105637	ETS-Lindgren	44583	300003747	izw	-/-	-/-
5	A	TRILOG Broadband Test-Antenna 30 MHz - 3 GHz	VULB9163	Schwarzbeck Mess - Elektronik	318	300003696	vKI!	30.09.2021	29.09.2023
6	A	Turntable	2089-4.0	EMCO	-/-	300004394	ne	-/-	-/-
7	A	PC	TecLine	F+W	-/-	300004388	ne	-/-	-/-
8	A	EMI Test Receiver	ESR3	Rohde & Schwarz	102587	300005771	k	09.12.2022	31.12.2023

7.2 Shielded fully anechoic chamber



Measurement distance: loop antenna 3 meter

$$FS = UR + CA + AF$$

(FS-field strength; UR-voltage at the receiver; CA-loss of the signal path; AF-antenna factor)

Example calculation:

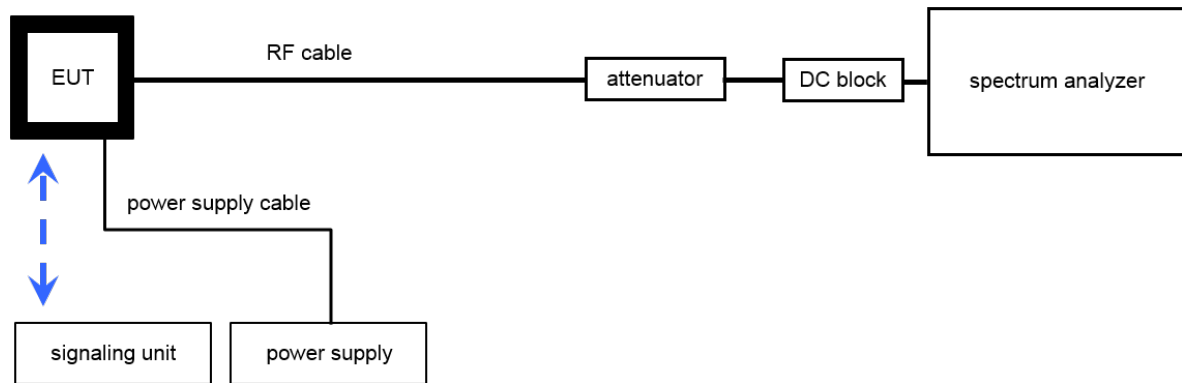
$$FS \text{ [dB}\mu\text{V/m]} = 40.0 \text{ [dB}\mu\text{V/m]} + (-35.8) \text{ [dB]} + 32.9 \text{ [dB/m]} = 37.1 \text{ [dB}\mu\text{V/m]} (71.61 \mu\text{V/m})$$

Equipment table:

No.	Setup	Equipment	Type	Manufacturer	Serial No.	INV. No.	Kind of Calibration	Last Calibration	Next Calibration
1	A	Active Loop Antenna 9 kHz to 30 MHz	6502	EMCO	2210	300001015	vKI!	02.08.2023	31.08.2025
2	A	Switch / Control Unit	3488A	HP	*	300000199	ne	-/-	-/-
3	A	Computer	Intel Core i3 3220/3,3 GHz, Prozessor		2V2403033A54 21	300004591	ne	-/-	-/-
4	A	NEXIO EMV-Software	BAT EMC V3.21.0.32	EMCO		300004682	ne	-/-	-/-
5	A	EMI Test Receiver 20Hz- 26,5GHz	ESU26	R&S	100037	300003555	k	07.12.2022	31.12.2023
6	A	Anechoic chamber		TDK		300003726	ne	-/-	-/-

7.3 Conducted measurements

Conducted measurements normal conditions



OP = AV + CA
(OP-output power; AV-analyzer value; CA-loss signal path)

Example calculation:

OP [dBm] = 6.0 [dBm] + 11.7 [dB] = 17.7 [dBm] (58.88 mW)

Equipment table:

Equipment table:

No.	Setup	Equipment	Type	Manufacturer	Serial No.	INV. No.	Kind of Calibration	Last Calibration	Next Calibration
1	A	Signal analyzer	FSW26	Rohde&Schwarz	101371	300005697	k	07.12.2023	31.12.2024
2	A	Signal analyzer	FSV30	Rohde&Schwarz	104365	300005923	k	13.12.2022	31.12.2023
3	A	Loop Antenna	-/-	ZEG TS Steinfurt	-/-	400001208	ev	-/-	-/-

8 Sequence of testing

8.1 Sequence of testing radiated spurious 9 kHz to 30 MHz

Setup

- The equipment is set up to simulate normal operation mode as described in the user manual or defined by the manufacturer.
- If the EUT is a tabletop system, it is placed on a table with 0.8 m height.
- If the EUT is a floor standing device, it is placed directly on the turn table.
- Auxiliary equipment and cables are positioned to simulate normal operation conditions as described in ANSI C 63.4.
- The AC power port of the EUT (if available) is connected to a power outlet below the turntable.
- Measurement distance is 3 m (see ANSI C 63.4) – see test details.
- EUT is set into operation.

Premeasurement*

- The turntable rotates from 0° to 315° using 45° steps.
- The antenna height is 1 m.
- At each turntable position the analyzer sweeps with positive-peak detector to find the maximum of all emissions.

Final measurement

- Identified emissions during the pre-measurement are maximized by the software by rotating the turntable from 0° to 360°.
- Loop antenna is rotated about its vertical axis for maximum response at each azimuth about the EUT. (For certain applications, the loop antenna plane may also need to be positioned horizontally at the specified distance from the EUT)
- The final measurement is done in the position (turntable and elevation) causing the highest emissions with quasi-peak (as described in ANSI C 63.4).
- Final levels, frequency, measuring time, bandwidth, turntable position, correction factor, margin to the limit and limit will be recorded. A plot with the graph of the premeasurement and the limit is stored.

*)Note: The sequence will be repeated three times with different EUT orientations.

8.2 Sequence of testing radiated spurious 30 MHz to 1 GHz

Setup

- The equipment is set up to simulate normal operation mode as described in the user manual or defined by the manufacturer.
- If the EUT is a tabletop system, a table with 0.8 m height is used, which is placed on the ground plane.
- If the EUT is a floor standing device, it is placed on the ground plane with insulation between both.
- Auxiliary equipment and cables are positioned to simulate normal operation conditions as described in ANSI C 63.4.
- The AC power port of the EUT (if available) is connected to a power outlet below the turntable.
- Measurement distance is 10 m or 3 m (see ANSI C 63.4) – see test details.
- EUT is set into operation.

Premeasurement

- The turntable rotates from 0° to 315° using 45° steps.
- The antenna is polarized vertical and horizontal.
- The antenna height changes from 1 m to 3 m.
- At each turntable position, antenna polarization and height the analyzer sweeps three times in peak to find the maximum of all emissions.

Final measurement

- The final measurement is performed for at least six highest peaks according to the requirements of the ANSI C63.4.
- Based on antenna and turntable positions at which the peak values are measured the software maximize the peaks by changing turntable position $\pm 45^\circ$ and antenna height between 1 and 4 m.
- The final measurement is done with quasi-peak detector (as described in ANSI C 63.4).
- Final levels, frequency, measuring time, bandwidth, antenna height, antenna polarization, turntable angle, correction factor, margin to the limit and limit are recorded. A plot with the graph of the premeasurement with marked maximum final results and the limit is stored.

9 Measurement uncertainty

Measurement uncertainty	
Test case	Uncertainty
Occupied bandwidth	± used RBW
Field strength of the fundamental	± 3 dB
Field strength of the harmonics and spurious	± 3 dB
Receiver spurious emissions and cabinet radiations	± 3 dB
Conducted limits	± 2.6 dB

10 Summary of measurement results

☒	No deviations from the technical specifications were ascertained
☐	There were deviations from the technical specifications ascertained
☐	This test report is only a partial test report. The content and verdict of the performed test cases are listed below.

TC Identifier	Description	Verdict	Date	Remark
RF-Testing	CFR Part 15 RSS Gen Issue 5 RSS 210 Issue 11	Passed	2024-10-21	-/-

Test specification clause	Test case	Temperature conditions	Power source conditions	C	NC	NA	NP	Remark
RSS Gen Issue 5 (6.7)	Occupied bandwidth 99% and x dB	Nominal	Nominal	☒	☐	☐	☐	-/-
§ 15.209 RSS-210, B.3 a	Field strength of the fundamental	Nominal	Nominal	☒	☐	☐	☐	-/-
§ 15.209 RSS Gen Issue 5 (6.13)	Field strength of the harmonics and spurious	Nominal	Nominal	☒	☐	☐	☐	-/-
§15.107 §15.207 RSS Gen Issue 5 (7.2)	Conducted limits	Nominal	Nominal	☐	☐	☒	☐	Battery powered only!

Note: NA = Not applicable; NP = Not performed; C = Compliant; NC = Not compliant

11 Additional comments

Reference documents: none

Special test descriptions: none

Configuration descriptions: none

12 Measurement results

12.1 Field strength of the fundamental

Measurement:

The maximum detected field strength for the carrier signal.

Measurement parameters	
Detector:	average
Resolution bandwidth:	9 kHz
Video bandwidth:	≥ 3x RBW
Trace mode:	Max hold
Used test setup	See sub clause 7.2 – A
Measurement uncertainty:	See sub clause 9

Limit:

FCC		
Frequency (MHz)	Field strength (μV/m)	Measurement distance (m)
1.705 – 30.0	30 (29.54dBμV/m)	30

IC		
Frequency (MHz)	Field strength (μV/m)	Measurement distance (m)
1.705 – 10.0	15 (23.52 dBμV/m)	30

- if the 6 dB bandwidth of the emission is less than 10% of the centre frequency, the field strength shall not exceed 15 μV/m at 30 m or (the bandwidth of the device in kHz) divided by (the centre frequency of the device in MHz) μV/m at 30 m, whichever is the higher level

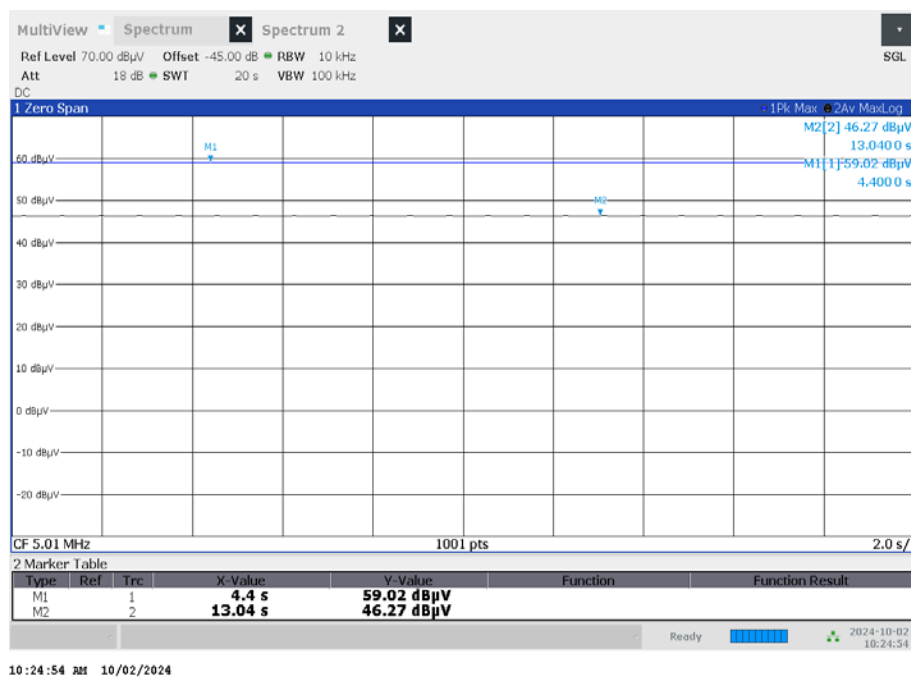
6dB BW = 3.72 kHz (< 501 KHz) → 15μV/m → 23.52 dBμV/m

Recalculation:

According to ANSI C63.10		
Frequency	Formula	Correction value
5.01 MHz	$FS_{\text{limit}} = FS_{\text{max}} - 40 \log\left(\frac{d_{\text{nearfield}}}{d_{\text{measure}}}\right) - 20 \log\left(\frac{d_{\text{limit}}}{d_{\text{nearfield}}}\right)$ FS_{limit} is the calculation of field strength at the limit distance, expressed in dBμV/m FS_{max} is the measured field strength, expressed in dBμV/m $d_{\text{nearfield}}$ is the $\lambda/2\pi$ distance d_{measure} is the distance of the measurement point from EUT d_{limit} is the reference limit distance	-30.03 dB from 3 m to 30 m

Result:

Field strength of the fundamental		
Frequency	5.01 MHz	
Distance	@ 3 m	@ 30 m
Measured / calculated value	59.02 dBµV/m (pk)	28.99 dBµV/m (pk)
	46.27 dBµV/m (avg)	16.24 dBµV/m (avg)

Plot: peak to average measurement

12.2 Occupied bandwidth (99% bandwidth)

Measurement:

Measurement parameters	
Detector:	Peak
Resolution bandwidth:	1 % – 5 % of the occupied bandwidth
Video bandwidth:	$\geq 3 \times \text{RBW}$
Trace mode:	Max hold
Analyser function:	99 % power function
Used test setup:	See chapter 7.3A
Measurement uncertainty:	See chapter 9

Limits:

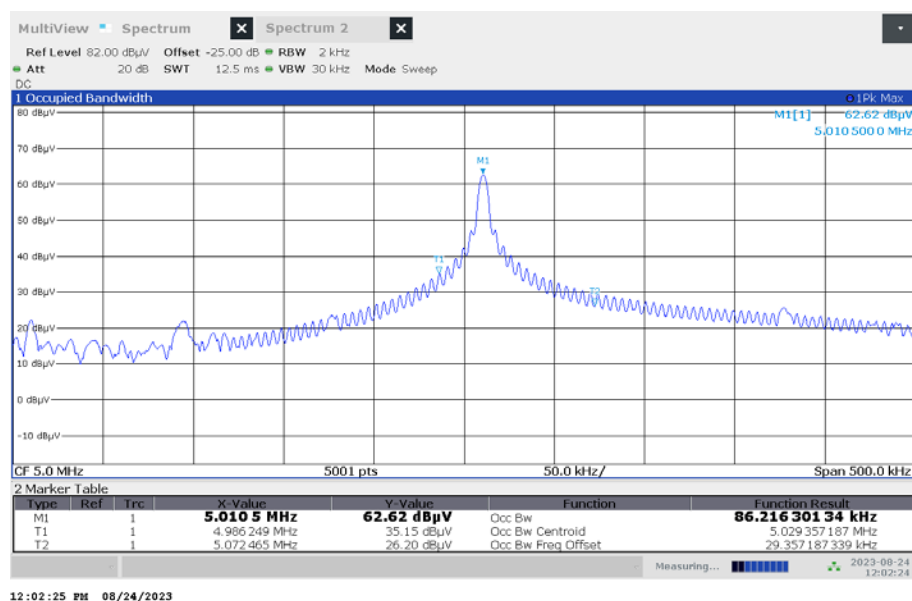
IC
-/-

Results:

TEST CONDITIONS	99 % bandwidth
EUT	
CP1175	86.21 kHz

Plots:

Plot 1: 99% bandwidth



12.3 Occupied bandwidth (6dB bandwidth)

Measurement:

Measurement parameters	
Detector:	Peak
Resolution bandwidth:	1 % – 5 % of the occupied bandwidth
Video bandwidth:	≥ 3x RBW
Trace mode:	Max hold
Analyser function:	ndB down function
Used test setup:	See chapter 7.3A
Measurement uncertainty:	See chapter 9

Limits:

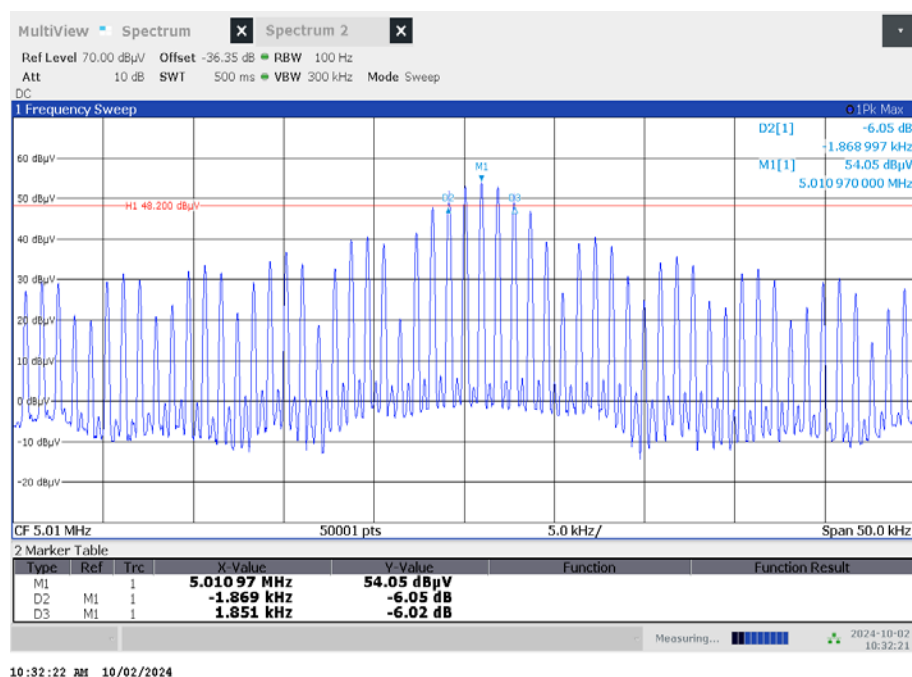
IC
-/-

Results:

TEST CONDITIONS	6 dB bandwidth
EUT	
CP1175	3.72 kHz

Plots:

Plot 1: 6dB bandwidth



12.4 Field strength of the harmonics and spurious

Measurement:

Measurement parameter	
Detector:	Average / Quasi Peak
Sweep time:	Auto
Resolution bandwidth:	F < 150 kHz: 200 Hz 150 kHz > F > 30 MHz: 9 kHz F > 30 MHz: 120 kHz
Video bandwidth:	F < 150 kHz: 1 kHz 150 kHz > F > 30 MHz: 100 kHz F > 30 MHz: 300 kHz
Span:	See plots!
Trace-Mode:	Max hold
Used test setup:	See chapter 7.1A, 7.2A
Measurement uncertainty:	See chapter 9

Limits:

FCC		
Frequency (MHz)	Field strength (µV/m)	Measurement distance (m)
0.009 – 0.490	2400/(F/kHz)	300
0.490 – 1.705	24000/(F/kHz)	30
1.705 – 30	30 (29.5 dBµV/m)	30
30 – 88	100 (40 dBµV/m)	3
88 – 216	150 (43.5 dBµV/m)	3
216 – 960	200 (46 dBµV/m)	3

IC		
Frequency (MHz)	Field strength (µA/m)	Measurement distance (m)
0.009 – 0.490	6.37/F (F in kHz)	300
0.490 – 1.705	63.7/F (F in kHz)	30
1.705 – 30	0.08 (-22 dBµA/m)	30

Result:

Spurious emissions				
f / (MHz)	Detector	Limit max. allowed / (dB μ V/m)	Amplitude of emission / (dB μ V/m)	Results
no peaks detected				

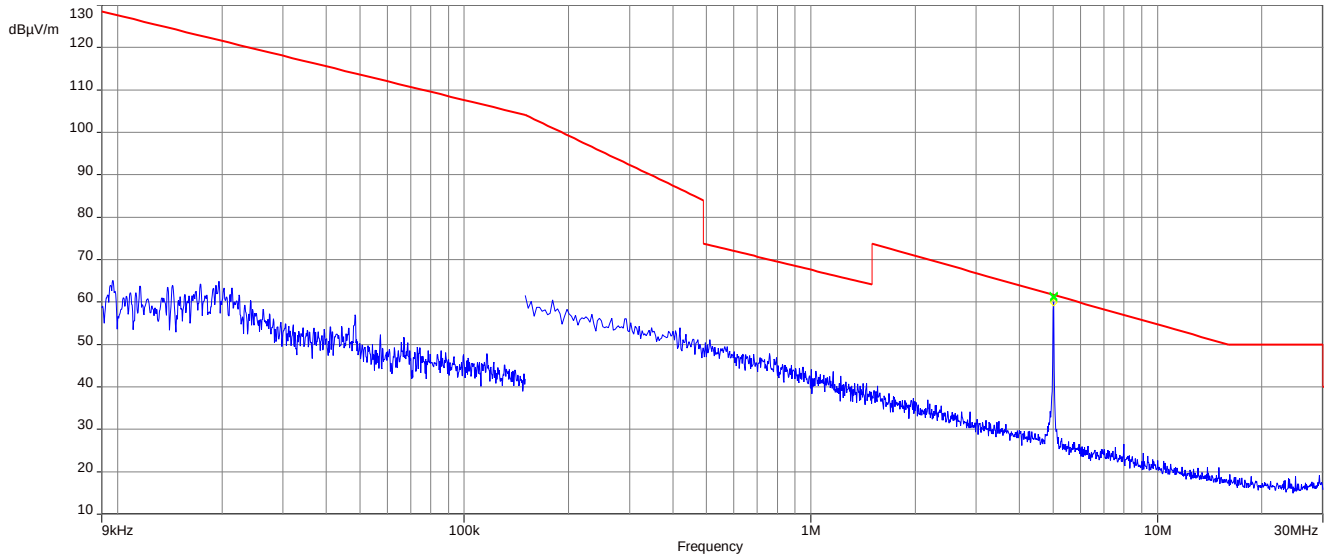
for spurious emissions >30MHz see table below plot

Result: Passed

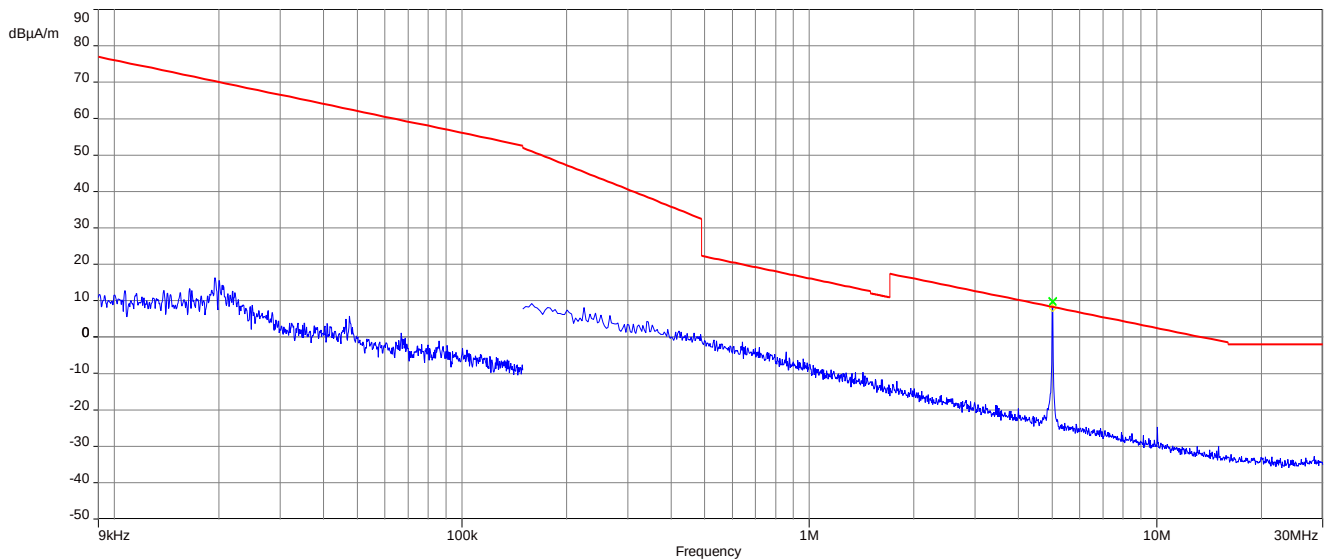
Note: The limit was recalculated with 20 dB / decade (Part 15.31) for all radiated spurious emissions 30 MHz to 1 GHz from 3 meter limit to a 10 meter distance. (40dB/decade for emissions < 30MHz)

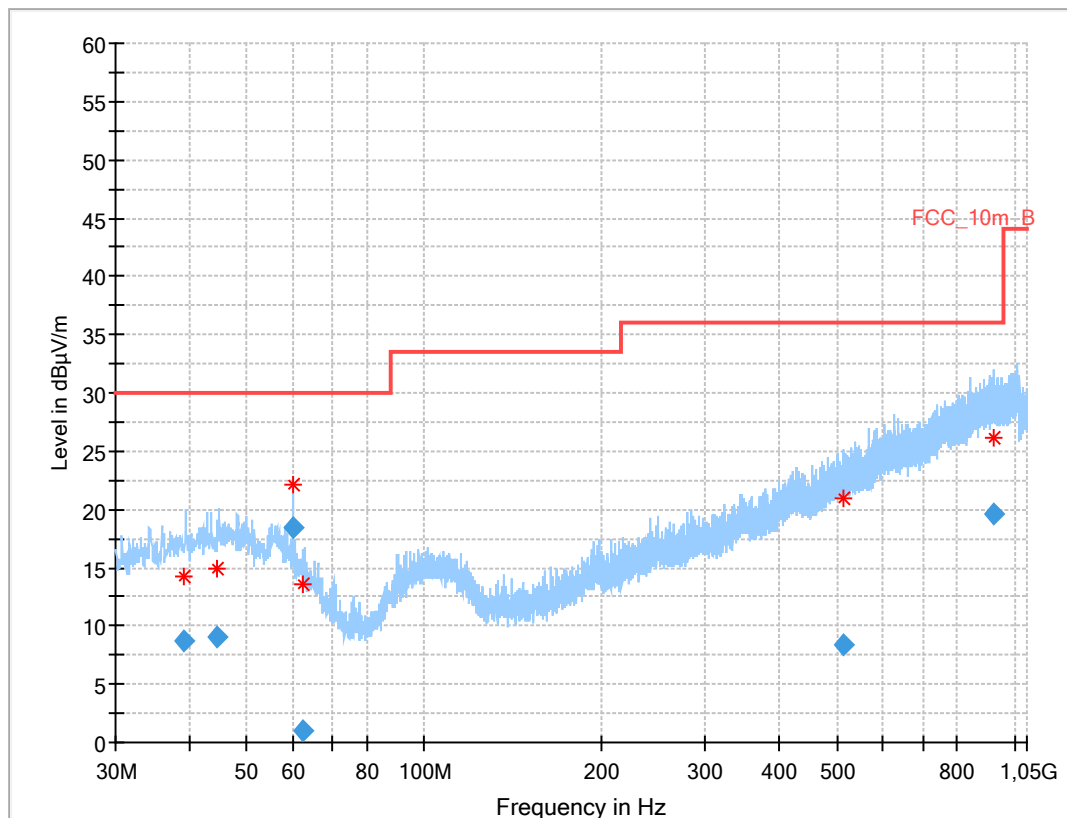
Plots: TX mode

Plot 1: 9 kHz – 30 MHz; magnetic FCC



Plot 2: 9 kHz – 30 MHz; magnetic IC



Plot 3: 30 MHz – 1000 MHz, vertical and horizontal polarization

Final_Result

Frequency (MHz)	QuasiPeak (dBμV/m)	Limit (dBμV/m)	Margin (dB)	Meas. Time (ms)	Bandwidth (kHz)	Height (cm)	Pol	Azimuth (deg)	Corr. (dB/m)
39.116	8.64	30.0	21.4	1000	120.0	393.0	V	123	15
44.700	8.99	30.0	21.0	1000	120.0	370.0	H	180	16
60.131	18.44	30.0	11.6	1000	120.0	317.0	V	81	14
62.470	0.96	30.0	29.0	1000	120.0	164.0	V	180	13
511.601	8.41	36.0	27.6	1000	120.0	400.0	H	223	20
925.414	19.65	36.0	16.4	1000	120.0	127.0	V	290	26

13 Glossary

EUT	Equipment under test
DUT	Device under test
UUT	Unit under test
GUE	GNSS User Equipment
ETSI	European Telecommunications Standards Institute
EN	European Standard
FCC	Federal Communications Commission
FCC ID	Company Identifier at FCC
IC	Industry Canada
PMN	Product marketing name
HMN	Host marketing name
HVIN	Hardware version identification number
FVIN	Firmware version identification number
EMC	Electromagnetic Compatibility
HW	Hardware
SW	Software
Inv. No.	Inventory number
S/N or SN	Serial number
C	Compliant
NC	Not compliant
NA	Not applicable
NP	Not performed
PP	Positive peak
QP	Quasi peak
AVG	Average
OC	Operating channel
OCW	Operating channel bandwidth
OBW	Occupied bandwidth
OOB	Out of band
DFS	Dynamic frequency selection
CAC	Channel availability check
OP	Occupancy period
NOP	Non occupancy period
DC	Duty cycle
PER	Packet error rate
CW	Clean wave
MC	Modulated carrier
WLAN	Wireless local area network
RLAN	Radio local area network
DSSS	Dynamic sequence spread spectrum
OFDM	Orthogonal frequency division multiplexing
FHSS	Frequency hopping spread spectrum
GNSS	Global Navigation Satellite System
C/N₀	Carrier to noise-density ratio, expressed in dB-Hz

14 Document history

Version	Applied changes	Date of release
-/-	Initial release	2023-10-27
A	editorial changes	2023-11-20
B	editorial changes	2024-09-18
C	6dB bandwidth results added	2024-10-02
D	editorial changes	2024-10-21

END OF TEST REPORT