



Garmin International, Inc.
1200 East 151st Street
Olathe, Kansas 66062
P: 913-397-8200 F: 913-397-8282

20-Feb-26

Manufacturer: Garmin International, Inc.
Address: 1200 E. 151st St.
Olathe, KS 66062-3426
U.S.A.
Chile Representative: Matías Rodríguez Correa
Rosario Norte 660 piso 24, Las Condes Santiago
Province CP 7550083, Chile
Contact Email: matias.rodriguez@garmin.com
Subject: SUBTEL, Chile (Resolution 737) Certification Compliance 2026
Commercial Name: HRM-Pro

	Información (Information)
Tipo de equipo (Equipment type)	Portable Digital Transceiver
Marca (Brand)	Garmin 
Modelo (Model)	A03699
Tecnología o modulación (Technology or modulation)	GFSK for ANT/ GFSK for BLE
Frecuencias (Frequencies)	2402-2480 MHz / 2402-2480 MHz
Ganancia de antena (dBi) (Antenna gain (dBi))	ANT 0.0 dBi / BLE 0.0 dBi
P.i.r.e. (E.I R P.)	-13.68 dBm, 0.04 mW / -10.25 dBm, 0.09 mW
Módulos (Modules)	ANT, BLE

Declaration of Conformity Statement: the equipment previously identified complies with the provisions established in the Technical Standard for Small Range Equipment, approved by Exempt Resolution No.1,985 of 2017, of the Undersecretary of Telecommunications.

Declaración de conformidad: El equipo anteriormente identificado cumple con las disposiciones establecidas en la Norma Técnica para Equipos de Corto Alcance, aprobada mediante la Resolución Exenta N° 1.985 de 2017, de la Subsecretaría de Telecomunicaciones.



Test Report Serial Number:	45461521 R1.0
Test Report Date:	22 May 2020
Project Number:	1457

EMC Test Report - New Filing

Applicant:



Garmin International Inc.
1200 E. 151st. Street
Olathe, KS, 66062
USA

FCC ID:

IPH-03699

Product Model Number / HVIN

A03699

IC Registration Number

1792A-03699

Product Name / PMN

A03699

In Accordance With:

CFR Title 47, Part 15 Subpart C (§15.249)

Part 15 Low Power Communication Device Transmitter (DXX)

RSS-Gen, RSS-210 Issue 9

Low Power Transmitter (2400-2483.5MHz)

Approved By:

Ben Hewson, President
 Celltech Labs Inc.
 21-364 Lougheed Rd.
 Kelowna, BC, V1X 7R8
 Canada



**Industry
Canada**



Test Lab Certificate: 2470.01

IC Registration 3874A-1

FCC Registration: CA3874

This report shall not be reproduced in any form without the expressed written consent of Celltech Labs Inc.

Table of Contents

1.0 DOCUMENT CONTROL.....	5
2.0 CLIENT AND DUT INFORMATION.....	6
3.0 SCOPE.....	7
4.0 TEST RESULT SUMMARY.....	8
5.0 NORMATIVE REFERENCES.....	9
6.0 FACILITIES AND ACCREDITATIONS.....	10
7.0 DUTY CYCLE EVALUATION.....	11
8.0 OCCUPIED BANDWIDTH.....	19
9.0 6DB BANDWIDTH.....	27
10.0 FIELD STRENGTH.....	35
11.0 BAND EDGE.....	61
12.0 RADIATED SPURIOUS EMISSIONS – RESTRICTED BANDS.....	67
APPENDIX A – TEST SETUP DRAWINGS AND EQUIPMENT.....	81
APPENDIX B – EQUIPMENT LIST AND CALIBRATION.....	84
APPENDIX C – MEASUREMENT INSTRUMENT UNCERTAINTY.....	85

Table of Plots

<i>Plot 7.1 – Duty Cycle – Normal Operation, ANT, On-Time</i>	12
<i>Plot 7.2 – Duty Cycle – Normal Operation, ANT, Total-Time</i>	13
<i>Plot 7.3 – Duty Cycle – Normal Operation, BLE, On-Time</i>	14
<i>Plot 7.4 – Duty Cycle – Normal Operation, BLE, Total-Time</i>	15
<i>Plot 7.5 – Duty Cycle – Test Mode Operation, ANT</i>	16
<i>Plot 7.6 – Duty Cycle – Test Mode Operation, BLE</i>	17
<i>Plot 8.1 – Occupied Bandwidth – 2402MHz, ANT</i>	20
<i>Plot 8.2 – Occupied Bandwidth – 2444MHz, ANT</i>	21
<i>Plot 8.3 – Occupied Bandwidth – 2480MHz, ANT</i>	22
<i>Plot 8.4 – Occupied Bandwidth – 2402MHz, BLE</i>	23
<i>Plot 8.5 – Occupied Bandwidth – 2444MHz, BLE</i>	24
<i>Plot 8.6 – Occupied Bandwidth – 2480MHz, BLE</i>	25
<i>Plot 9.1 – 6dB Bandwidth, 2402MHz, ANT</i>	28
<i>Plot 9.2 – 6dB Bandwidth, 2444MHz, ANT</i>	29
<i>Plot 9.3 – 6dB Bandwidth, 2480MHz, ANT</i>	30
<i>Plot 9.4 – 6dB Bandwidth, 2402MHz, BLE</i>	31
<i>Plot 9.5 – 6dB Bandwidth, 2444MHz, BLE</i>	32
<i>Plot 9.6 – 6dB Bandwidth, 2480MHz, BLE</i>	33
<i>Plot 10.1 – Field Strength, ANT, 2402MHz, Horizontal, Peak</i>	36
<i>Plot 10.2 – Field Strength, ANT, 2402MHz, Horizontal, RMS</i>	37
<i>Plot 10.3 – Field Strength, ANT, 2402MHz, Vertical, Peak</i>	38
<i>Plot 10.4 – Field Strength, ANT, 2402MHz, Vertical, RMS</i>	39
<i>Plot 10.5 – Field Strength, ANT, 2444MHz, Horizontal, Peak</i>	40
<i>Plot 10.6 – Field Strength, ANT, 2444MHz, Horizontal, RMS</i>	41
<i>Plot 10.7 – Field Strength, ANT, 2444MHz, Vertical, Peak</i>	42
<i>Plot 10.8 – Field Strength, ANT, 2444MHz, Vertical, RMS</i>	43
<i>Plot 10.9 – Field Strength, ANT, 2480MHz, Horizontal, Peak</i>	44
<i>Plot 10.10 – Field Strength, ANT, 2480MHz, Horizontal, RMS</i>	45
<i>Plot 10.11 – Field Strength, ANT, 2480MHz, Vertical, Peak</i>	46
<i>Plot 10.12 – Field Strength, ANT, 2480MHz, Vertical, RMS</i>	47
<i>Plot 10.13 – Field Strength, BLE, 2402MHz, Horizontal, Peak</i>	48
<i>Plot 10.14 – Field Strength, BLE, 2402MHz, Horizontal, RMS</i>	49
<i>Plot 10.15 – Field Strength, BLE, 2402MHz, Vertical, Peak</i>	50
<i>Plot 10.16 – Field Strength, BLE, 2402MHz, Vertical, RMS</i>	51
<i>Plot 10.17 – Field Strength, BLE, 2444MHz, Horizontal, Peak</i>	52
<i>Plot 10.18 – Field Strength, BLE, 2444MHz, Horizontal, RMS</i>	53
<i>Plot 10.19 – Field Strength, BLE, 2444MHz, Vertical, Peak</i>	54
<i>Plot 10.20 – Field Strength, BLE, 2444MHz, Vertical, RMS</i>	55
<i>Plot 10.21 – Field Strength, BLE, 2480MHz, Horizontal, Peak</i>	56
<i>Plot 10.22 – Field Strength, BLE, 2480MHz, Horizontal, RMS</i>	57
<i>Plot 10.23 – Field Strength, BLE, 2480MHz, Vertical, Peak</i>	58
<i>Plot 10.24 – Field Strength, BLE, 2480MHz, Vertical, RMS</i>	59
<i>Plot 11.1 – 2402MHz, ANT, Lower Band Edge</i>	62
<i>Plot 11.2 – 2480MHz, ANT, Upper Band Edge</i>	63
<i>Plot 11.3 – 2402MHz, BLE, Lower Band Edge</i>	64
<i>Plot 11.4 – 2480MHz, BLE, Upper Band Edge</i>	65

<i>Plot 12.1 – Spurious Emissions - 9kHz – 30MHz, Front Polarization</i>	68
<i>Plot 12.2 – Spurious Emissions - 9kHz – 30MHz, Side Polarization</i>	69
<i>Plot 12.3 – Spurious Emissions - 30MHz – 1000MHz, Horizontal</i>	70
<i>Plot 12.4 – Spurious Emissions - 30MHz – 1000MHz, Vertical</i>	71
<i>Plot 12.5 – Spurious Emissions - 3GHz – 10GHz, Horizontal</i>	72
<i>Plot 12.6 – Spurious Emissions - 3GHz – 10GHz, Vertical</i>	73
<i>Plot 12.7 – Spurious Emissions - 10GHz – 13.6GHz, Horizontal</i>	74
<i>Plot 12.8 – Spurious Emissions - 10GHz – 13.6GHz, Vertical</i>	75
<i>Plot 12.9 – Spurious Emissions - 13.6GHz – 18GHz, Horizontal</i>	76
<i>Plot 12.10 – Spurious Emissions - 13.6GHz – 18GHz, Vertical</i>	77
<i>Plot 12.11 – Spurious Emissions - 18GHz – 25GHz, Horizontal</i>	78
<i>Plot 12.12 – Spurious Emissions - 18GHz – 25GHz, Vertical</i>	79

Table of Tables

<i>Table 7.1 - Summary of Duty Cycle Evaluation</i>	18
<i>Table 8.1 - Summary of Occupied Bandwidth Measurements</i>	26
<i>Table 9.1 - Summary of 6dB Bandwidth Measurements</i>	34
<i>Table 10.1 - Summary of Field Strength Measurements, ANT</i>	60
<i>Table 10.2 - Summary of Field Strength Measurements, BLE</i>	60
<i>Table 11.1 – Summary of Band Edge Measurements</i>	66
<i>Table 12.1 – Summary of Radiated Emissions – Restricted Band</i>	80
<i>Table A.1 – Setup - Conducted Measurements Equipment</i>	81
<i>Table A.2 – Setup - Radiated Emissions Equipment</i>	82

Table of Figures

<i>Figure A.1 – Test Setup Conducted Measurements</i>	81
<i>Figure A.2 – Test Setup Radiated Emissions Measurements 30-1000MHz</i>	83
<i>Figure A.3 – Test Setup Radiated Emissions Measurements 1-18GHz</i>	83
<i>Figure A.4 – Test Setup Radiated Emissions Measurements 18-26.5GHz</i>	83

1.0 DOCUMENT CONTROL

Revision History					
Samples Tested By:		Art Voss, P.Eng.	Date(s) of Evaluation:		29 July - 22 August, 2019
Report Prepared By:		Art Voss, P.Eng.	Report Reviewed By:		Ben Hewson
Report Revision	Description of Revision	Revised Section	Revised By	Revision Date	
0.2	Initial Draft Release	n/a	Art Voss	23 August 2019	
0.3	Revised FCC 731 Form, ISED Annex I-II Form	n/a	Art Voss	3 September 2019	
	Deleted Duplicate Exhibit 17 - <i>DUT Photos</i>	n/a			
	Revised Test Report Section 2.0, DUT Info	2.0			
0.4	Revised Test Report Section 2.0, DUT Info	2.0	Art Voss	7 October 2019	
0.5	Revised DUT Battery Info	7.0	Art Voss	21 October 2019	
	Revised Term n/a for None Detected	12.0			
1.0	Initial Release	n/a	Art Voss	22 May 2020	

2.0 CLIENT AND DUT INFORMATION

Client Information	
Applicant Name	Garmin International Inc.
Applicant Address	1200 East 151st. Street
	Olathe, KS
	66062
	USA
DUT Information	
Device Identifier(s):	FCC ID: IPH-03699
	ISED ID: 1792A-03699
Device Type:	Digital BLE/ANT Transceiver
Equipment Class (FCC):	Part 15 Low Power Communication Device Transmitter (DXX)
Equipment Class (ISED):	Low Power Transmitter (2400-2483.5MHz)
Device Model(s) / HVIN:	A03699
Device Marketing Name / PMN:	A03699
Firmware Version ID Number / FVIN:	-
Host Marketing Name / HMN:	-
Test Sample Serial No.:	T/A Sample - Identical Prototype
Transmit Frequency Range:	2402 - 2480MHz
Test Channels:	79 Channel Programmable
Manuf. Max. Rated Output Power:	8dBm
Manuf. Max. Rated BW/Data Rate:	ANT: 920kHz & BLE: 1.07MHz
Antenna Make and Model:	PCB Single Ended Whip
Antenna Type and Gain:	0dBi
Modulation:	ANT: GFSK, BLE: GMSK
Mode:	Simplex
Emission Designator:	See Section 8.0
DUT Power Source:	3VDC Non-Rechargeable Battery Coin(Type: CR2032)
DUT Dimensions [HxWxD] (mm)	H x W x D: 10mm x 50mm x 30mm
Deviation(s) from standard/procedure:	None
Modification of DUT:	None

3.0 SCOPE

This Certification Report was prepared on behalf of:

Garmin International Inc.

, (the '*Applicant*'), in accordance with the applicable Federal Communications Commission (FCC) CFR 47 and Innovation, Scientific and Economic Development (ISED) Canada rules parts and regulations (the '*Rules*'). The scope of this investigation was limited to only the equipment, devices and accessories (the '*Equipment*') supplied by the *Applicant*. The tests and measurements performed on this *Equipment* were only those set forth in the applicable *Rules* and/or the Test and Measurement Standards they reference. The *Rules* applied and the Test and Measurement Standards used during this evaluation appear in the Normative References section of this report. The limits set forth in the technical requirements of the applicable *Rules* were applied to the measurement results obtained during this evaluation and, unless otherwise noted, these limits were used as the Pass/Fail criteria. The Pass/Fail statements made in this report apply to only the tests and measurements performed on only the *Equipment* tested during this evaluation. Where applicable and permissible, information including test and measurement data and/or results from previous evaluations of same or similar equipment, devices and/or accessories may be cited in this report.

As per FCC CFR 47 Part §2.1091 and §2.1093 and Health Canada Safety Code 6, an RF Exposure evaluation report is required for this *Equipment* and the results of the RF Exposure evaluation appear in a separate exhibit from this report.

The Receiver of this *Equipment* is subject to Equipment Certification or Supplier's Declaration of Conformity (SDoC) in accordance with 47 CFR Part §15.101. The Receiver was evaluated in accordance with 47 CFR Part §15 Subpar B and ICES-003. A statement of the application the SDoC procedure appears in a separate exhibit from this report.

Application:

This application is for a new certification of a low power BLE/ANT Body Worn Health and Fitness transceiver.

I attest that the data reported herein is true and accurate within the tolerance of the Measurement Instrument Uncertainty; that all tests and measurements were performed in accordance with accepted practices or procedures; and that all tests and measurements were performed by me or by trained personnel under my direct supervision. The results of this investigation are based solely on the test sample(s) provided by the client which were not adjusted, modified or altered in any manner whatsoever, except as required to carry out specific tests or measurements. This test report has been completed in accordance with ISO/IEC 17025.



Art Voss, P.Eng.
Technical Manager
Celltech Labs Inc.

21 August 2019

Date



4.0 TEST RESULT SUMMARY

TEST SUMMARY						
Section	Description of Test	Procedure Reference	Applicable Rule Part(s) FCC	Applicable Rule Part(s) ISED	Test Date	Result
7.0	Duty Cycle and Transmission Duration	ANSI C63.10-2013 KDB 558074 D01v05	§15.35(c)	n/a	12 Aug 2019	n/a
8.0	Occupied Bandwidth	ANSI C63.10-2013 KDB 558074 D01v05	§2.1049	RSS-Gen (6.7)	12 Aug 2019	Pass
9.0	6dB Bandwidth	ANSI C63.10-2013 KDB 558074 D01v05	n/a	RSS-Gen (6.7)	12 Aug 2019	Pass
10.0	Field Strength (Fundamental)	ANSI C63.10-2013 KDB 558074 D01v05	§15.249(a)(e)	RSS-Gen (6.12) RSS-210 (B.10)	30 July 2019	Pass
11.0	Band Edge	ANSI C63.10-2013 KDB 558074 D01v05	§15.249(a)(e)	RSS-Gen (6.12) RSS-210 (B.10)	12 Aug 2019	Pass
12.0	Restricted Bands	ANSI C63.10-2013 KDB 558074 D01v05	§15.249(d)(e) §15.209	RSS-Gen (8.10)	13 Aug 2019	Pass

Test Station Day Log					
Date	Ambient Temp (°C)	Relative Humidity (%)	Barometric Pressure (kPa)	Test Station	Tests Performed Section(s)
9 July 2019	24.0	28	101.6	OATS	10
10 July 2019	24.0	22	101.3	OATS	10
30 July 2019	27.3	14	101.1	EMC	7, 8, 9
12 Aug 2019	24.9	21	102.0	EMC	7, 8, 9
13 Aug 2019	27.1	46	101.9	OATS	11

EMC - EMC Test Bench
OATS - Open Area Test Site
LISN - LISN Test Area
IMM - Immunity Test Area

SAC - Semi-Anechoic Chamber
TC - Temperature Chamber
ESD - ESD Test Bench
RI - Radiated Immunity Chamber

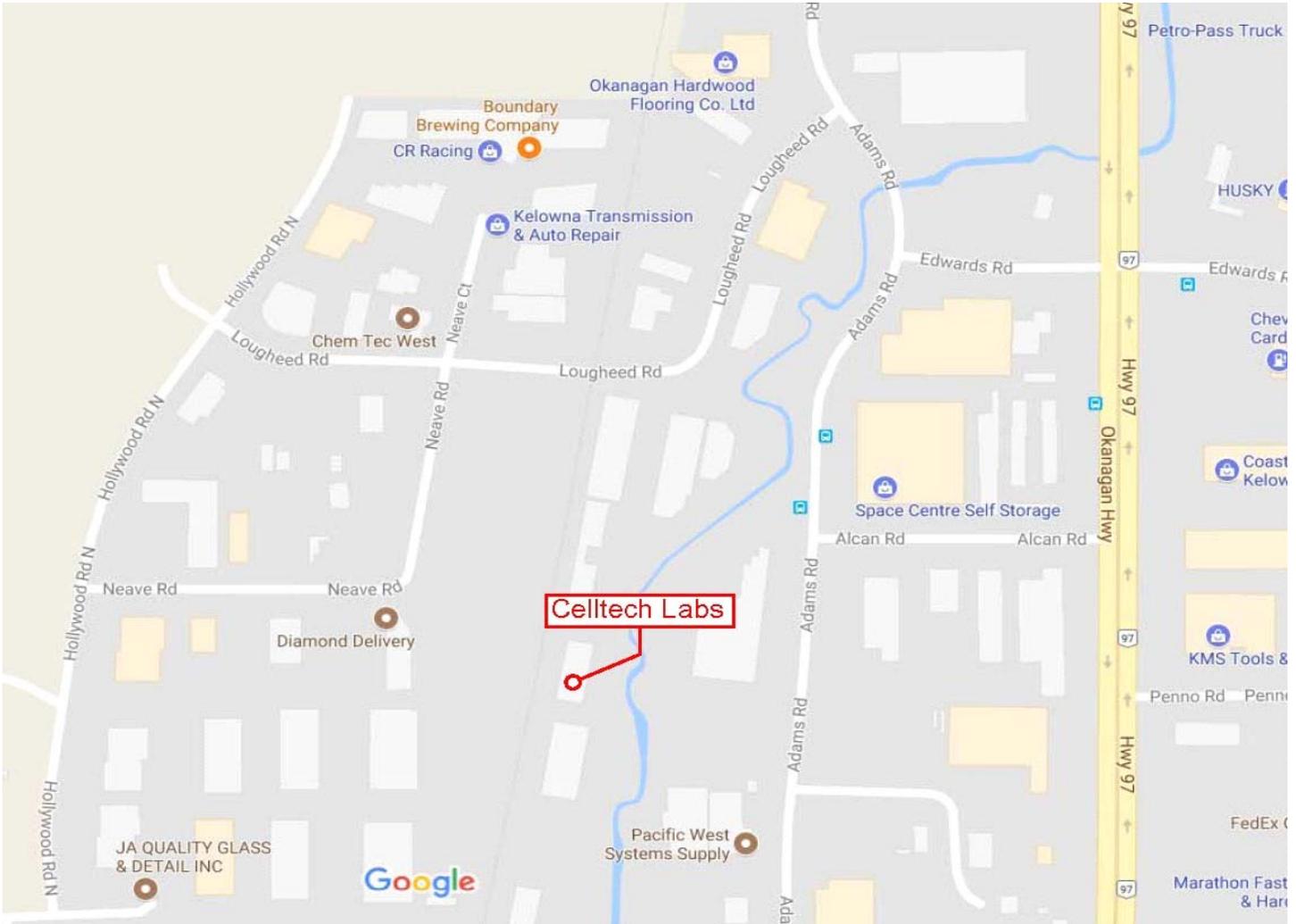
5.0 NORMATIVE REFERENCES

Normative References	
ISO/IEC 17025:2017	General requirements for the competence of testing and calibration laboratories
ANSI C63.10-2013	American National Standard of Procedures for Compliance Testing of Unlicensed Wireless Devices
CFR	Code of Federal Regulations Title 47: Telecommunication Part 2: Frequency Allocations and Radio Treaty Matters; General Rules and Regulations
CFR	Code of Federal Regulations Title 47: Telecommunication Part 15: Radio Frequency Devices Sub Part C (15.249) Intentional Radiators
CFR	Code of Federal Regulations Title 47: Telecommunication Part 15: Radio Frequency Devices Subpart B: Unintentional Radiators
ISED	Innovation, Science and Economic Development Canada Spectrum Management and Telecommunications Radio Standards Specification RSS-Gen Issue 5: General Requirements and Information for the Certification of Radiocommunication Equipment
ISED	Innovation, Science and Economic Development Canada Spectrum Management and Telecommunications Radio Standards Specification RSS-210 Issue 9: Licence-Exempt Radio Apparatus: Category I Equipment
FCC KDB	OET Major Guidance Publications, Knowledge Data Base 558074 D01v05 Guidance for Performing Compliance Measurements on Digital Transmission Systems (DTS) Operating Under Section 15.247

6.0 FACILITIES AND ACCREDITATIONS

Facility and Accreditation:

The facilities used to evaluate this device outlined in this report are located at 21-364 Lougheed Road, Kelowna, British Columbia, Canada V1X 7R8. The radiated emissions site (OATS) conforms to the requirements set forth in ANSI C63.4 and is filed and listed with the FCC under Test Firm Registration Number CA3874A-1 and Industry Canada under Test Site File Number IC 3874A-1. Celltech is accredited to ISO 17025, through accrediting body A2LA and with certificate 2470.01.



7.0 DUTY CYCLE EVALUATION

Test Procedure

Normative Reference KDB 558074 (6.0), ANSI C63.10 (11.6)

Limits

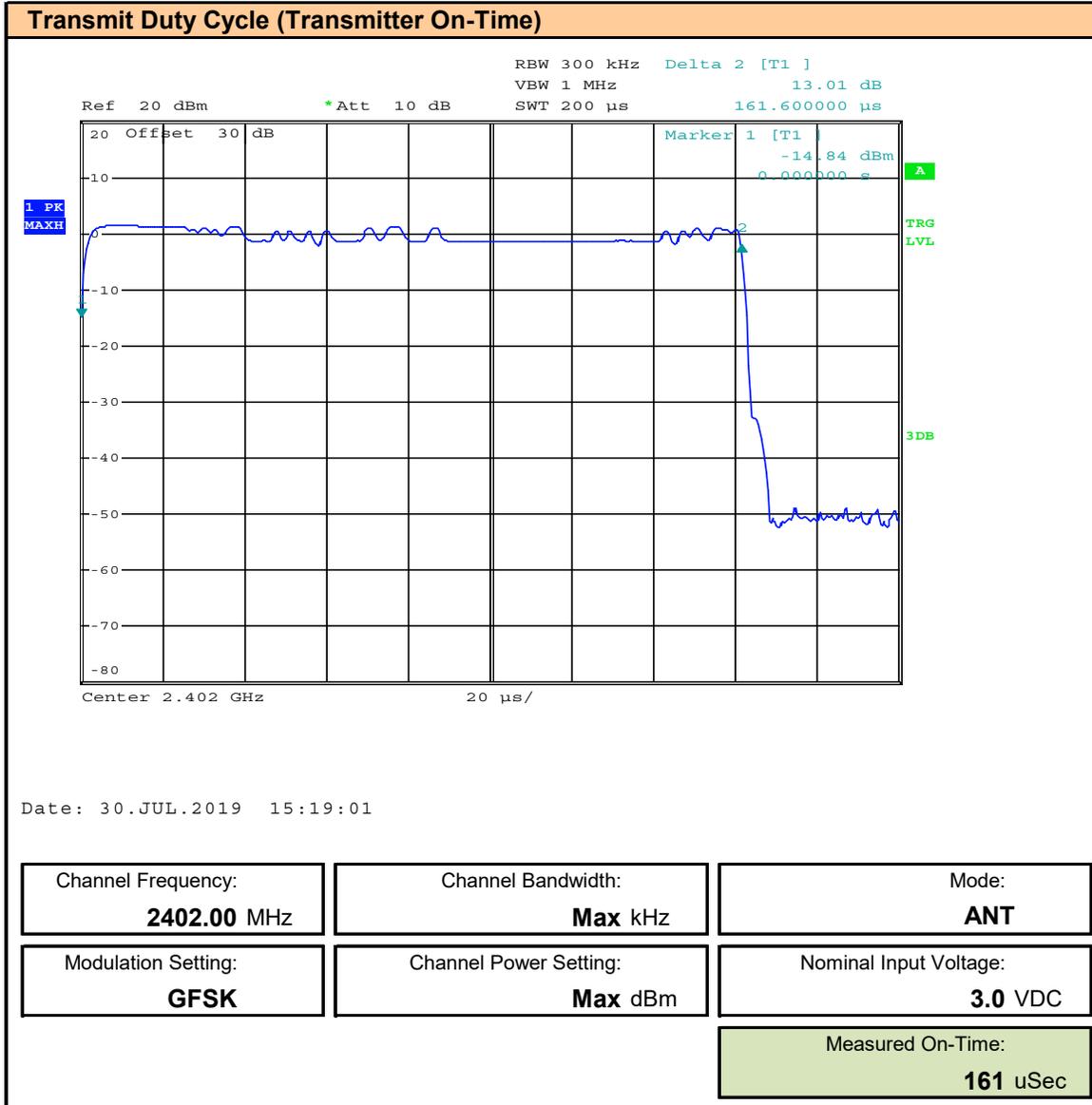
KDB 558074 (6.0) C63.10 (11.6)	6.0 Duty cycle, transmission duration and maximum power control level b) The zero-span mode on a spectrum analyzer or EMI receiver if the response time and spacing between bins on the sweep are sufficient to permit accurate measurements of the on- and off-times of the transmitted signal. 1) Set the center frequency of the instrument to the center frequency of the transmission. 2) Set RBW \geq OBW if possible; otherwise, set RBW to the largest available value. 3) Set detector = peak or average. 4) The zero-span measurement method shall not be used unless both RBW and VBW are $> 50/T$ and the number of sweep points across duration T exceeds 100.
-----------------------------------	---

Test Setup Appendix A Figure A.1

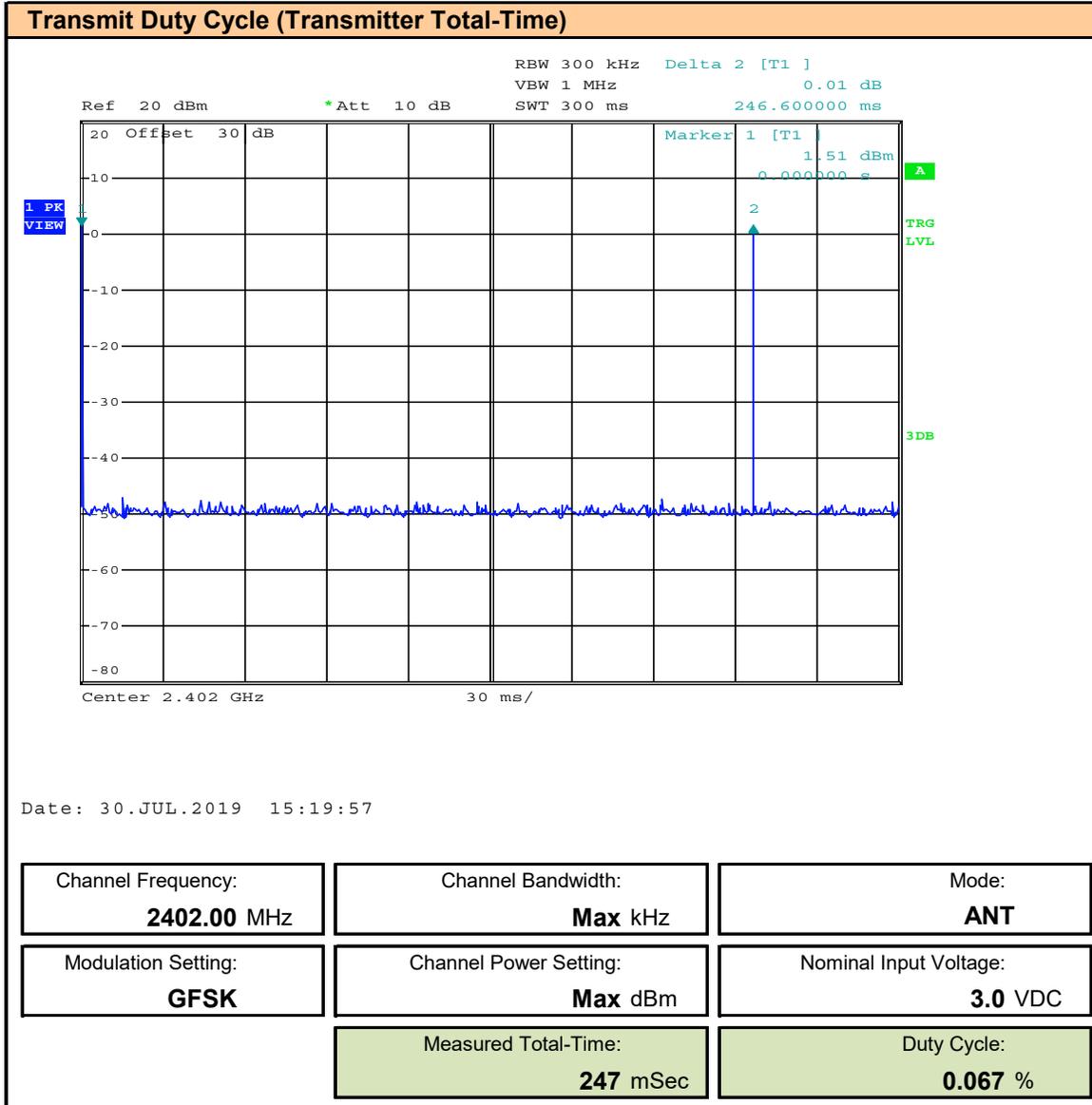
Measurement Procedure

The DUT was connected to a Spectrum Analyzer (SA) via a 30dB attenuator connected to the DUT's antenna port. The SA was configured as above using the Zero Span and Positive Trigger. The output power of the DUT was set to the manufacturer's highest output power setting at the Mid frequency channel as permitted by the device. The DUT was set to transmit at its maximum Duty Cycle. The variation in Duty Cycle was determined to be less than +/- 2%.

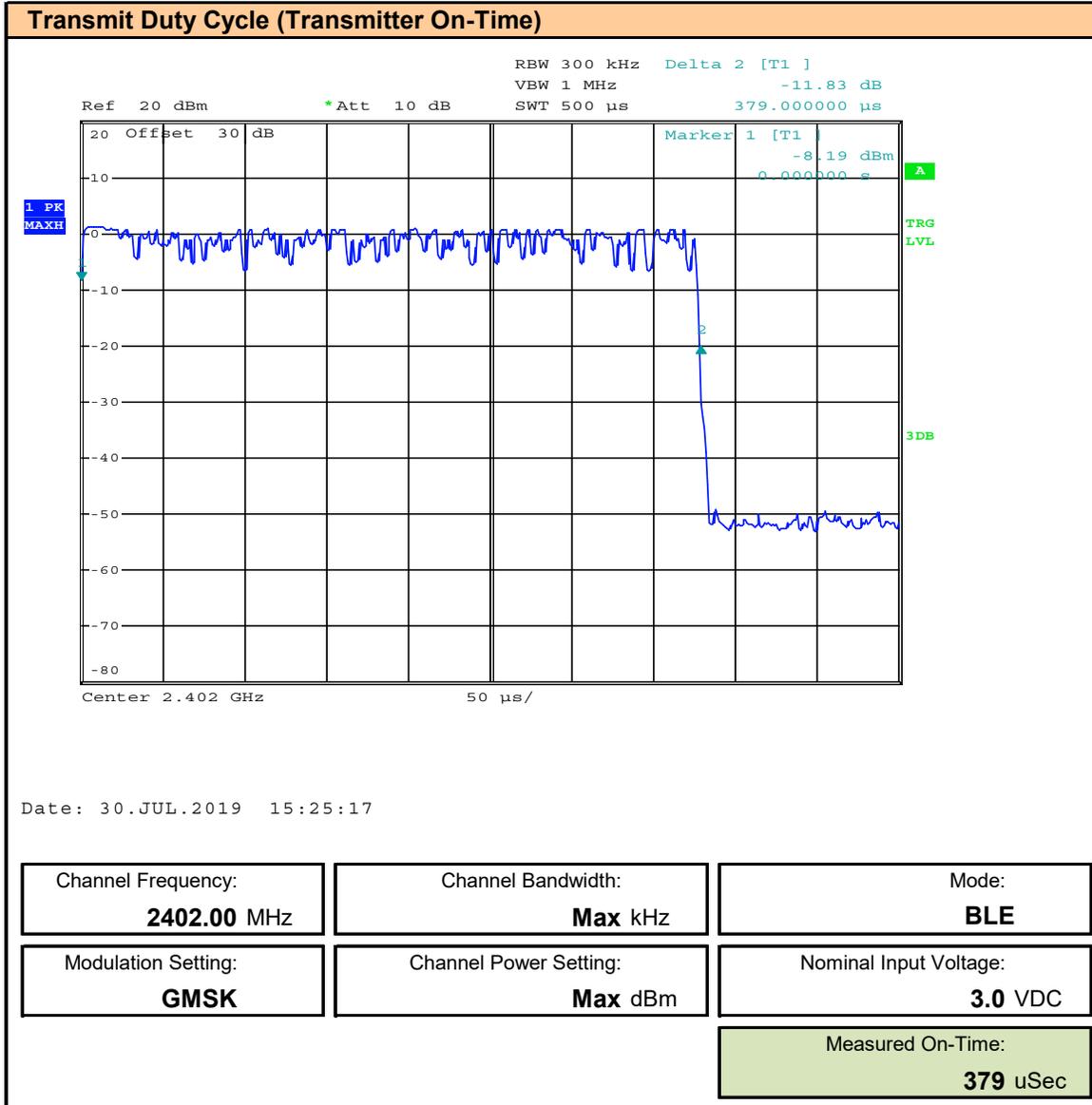
Plot 7.1 – Duty Cycle – Normal Operation, ANT, On-Time



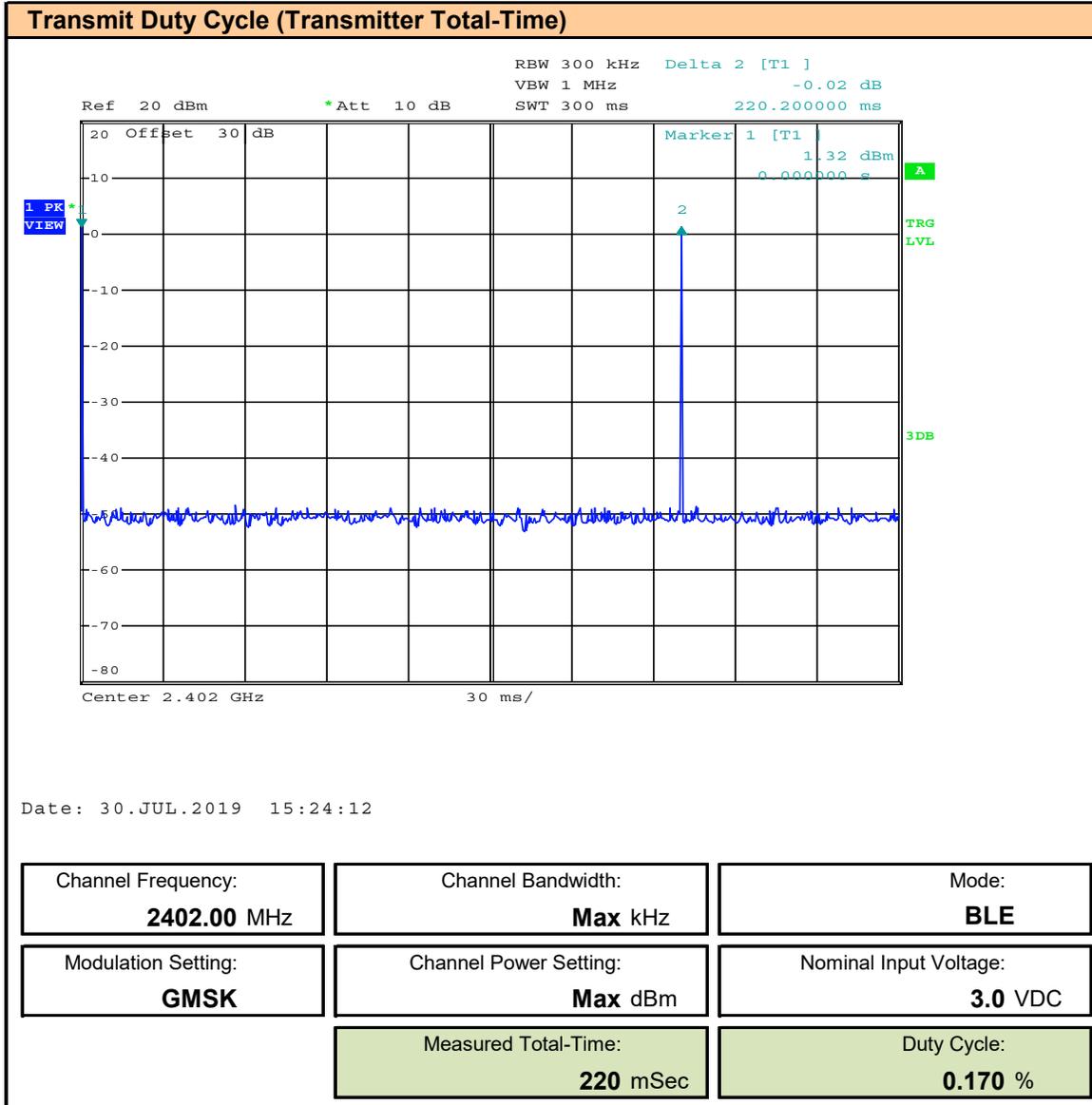
Plot 7.2 – Duty Cycle – Normal Operation, ANT, Total-Time



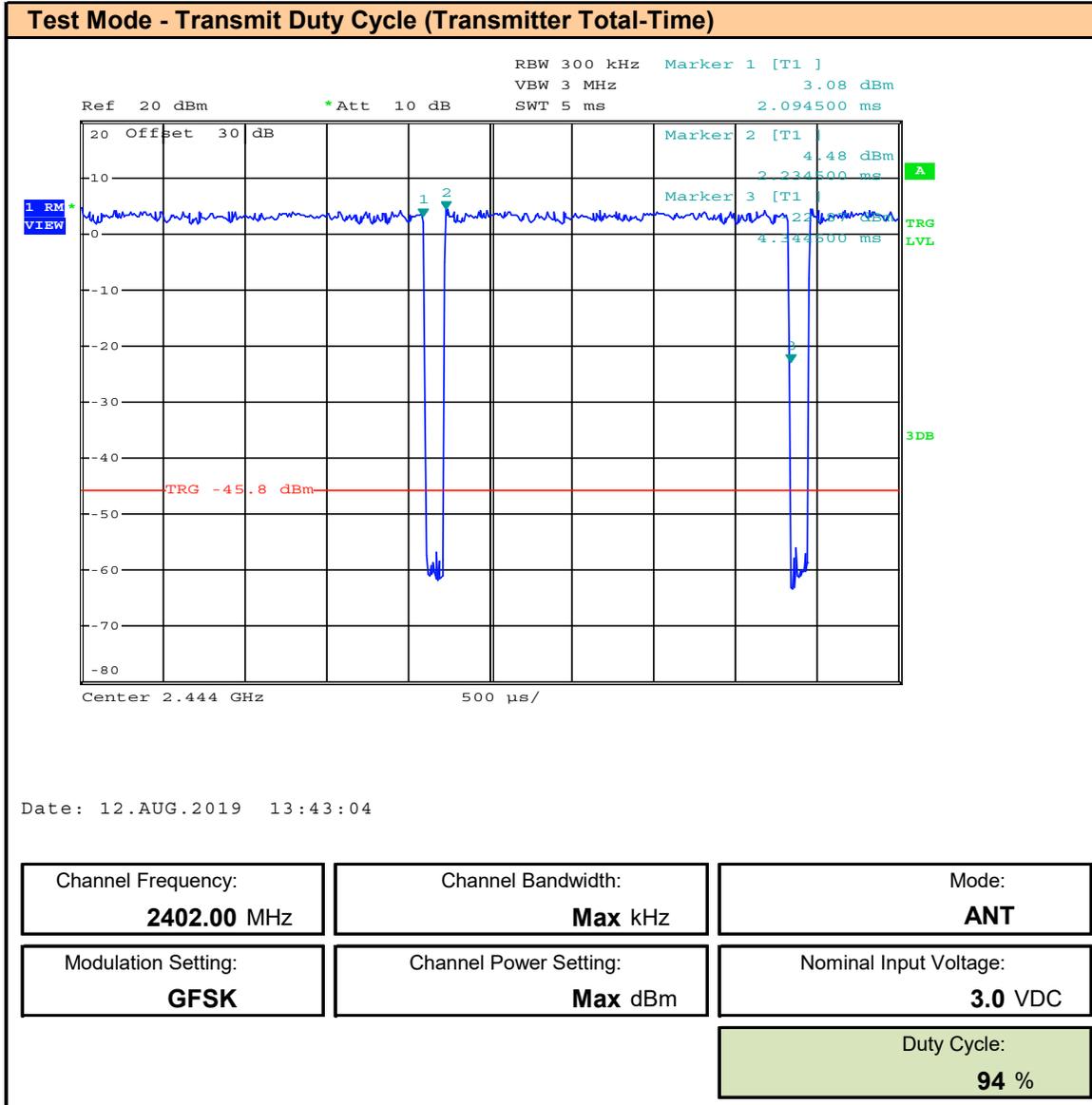
Plot 7.3 – Duty Cycle – Normal Operation, BLE, On-Time



Plot 7.4 – Duty Cycle – Normal Operation, BLE, Total-Time



Plot 7.5 – Duty Cycle – Test Mode Operation, ANT



Plot 7.6 – Duty Cycle – Test Mode Operation, BLE

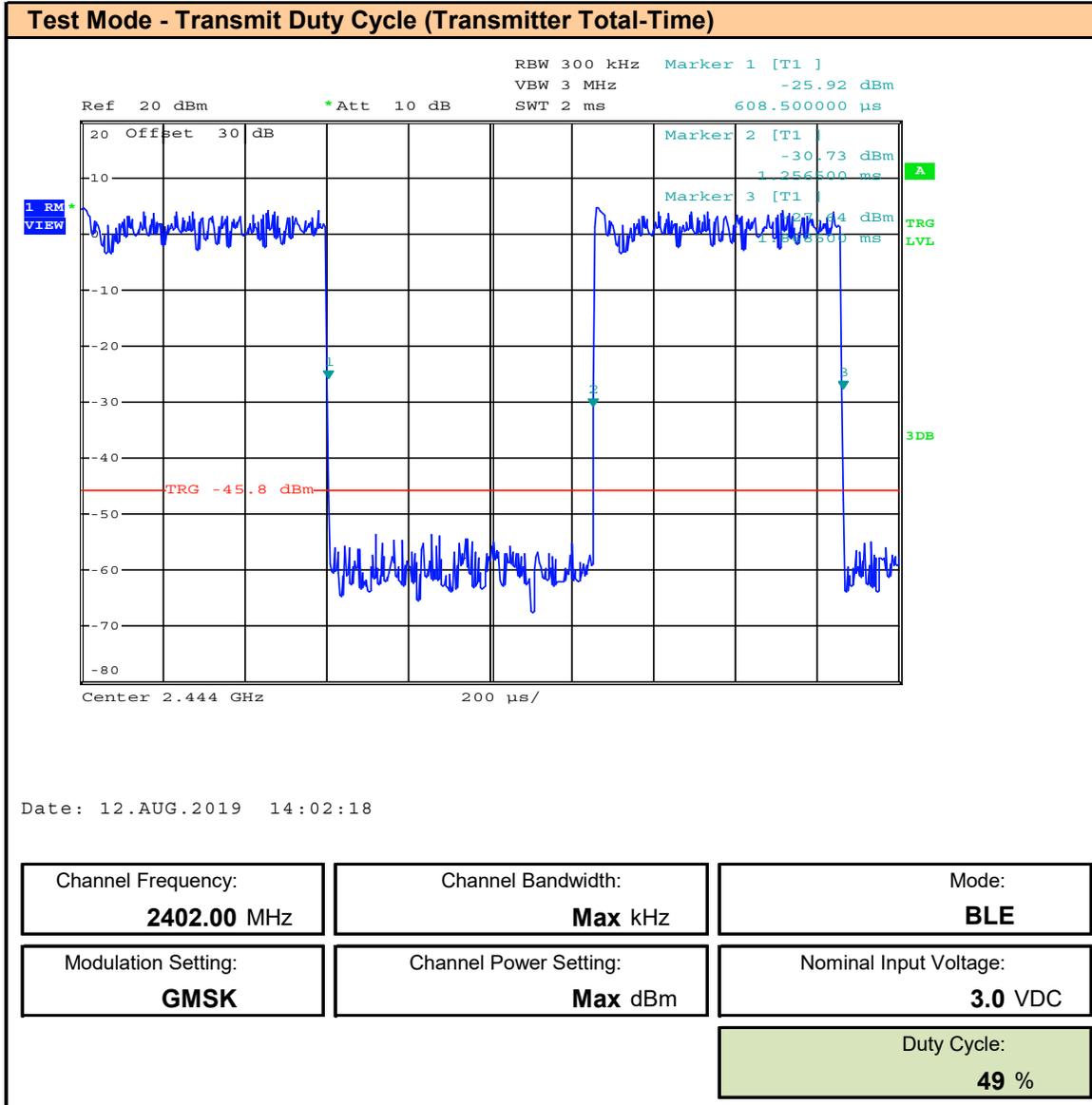


Table 7.1 - Summary of Duty Cycle Evaluation

Transmit Duty Cycle Results					
Frequency (MHz)	Bandwidth Setting (kHz)	Supply Voltage (VDC)	Mode	Operation	Measured Duty Cycle Cycle (%)
2402	Max	3	ANT	Normal	0.067
			BLE	Normal	0.170
			ANT	Test Mode	94
			BLE	Test Mode	49

The variation of the transmit duty cycle was less than 2%

8.0 OCCUPIED BANDWIDTH

Test Procedure

Normative Reference	FCC 47 CFR §2.1046, §15.247(b)(3), RSS-Gen (6.1.2), RSS-247 (5.4)(d), KDB 558074 (8.3.2.1), ANSI C63.10 (6.9.3)
----------------------------	--

General Procedure

KDB 558074 (8.3.2.1)	<p>8.3.2.1 General</p> <p>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.</p>
C63.10 (6.9.3)	<p>6.9.3 Occupied bandwidth—power bandwidth (99%) measurement procedure</p> <p>The occupied bandwidth is the frequency bandwidth such that, below its lower and above its upper frequency limits, the mean powers are each equal to 0.5% of the total mean power of the given emission. The following procedure shall be used for measuring 99% power bandwidth:</p> <ol style="list-style-type: none"> The instrument center frequency is set to the nominal EUT channel center frequency. The frequency span for the spectrum analyzer shall be between 1.5 times and 5.0 times the OBW. The nominal IF filter bandwidth (3 dB RBW) shall be in the range of 1% to 5% of the OBW, and VBW shall be approximately three times the RBW, unless otherwise specified by the applicable requirement. Set the reference level of the instrument as required, keeping the signal from exceeding the maximum input mixer level for linear operation. In general, the peak of the spectral envelope shall be more than $[10 \log (OBW/RBW)]$ below the reference level. Specific guidance is given in 4.1.5.2. Step a) through step c) might require iteration to adjust within the specified range. Video averaging is not permitted. Where practical, a sample detection and single sweep mode shall be used. Otherwise, peak detection and max hold mode (until the trace stabilizes) shall be used. Use the 99% power bandwidth function of the instrument (if available) and report the measured bandwidth.

Test Setup

Appendix A - Figure A.1

Measurement Procedure

The DUT was connected to a Spectrum Analyzer (SA) via a 30dB attenuator connected to the DUT's antenna port. The SA was configured as described above using the 99% Occupied Bandwidth function. The output power of the DUT was set to the manufacturer's highest output power setting at the Low, Mid and High frequency channels as permitted by the device. The DUT was set to transmit at its maximum Duty Cycle. The 99% Occupied Bandwidth was measured and recorded.

Plot 8.3 – Occupied Bandwidth – 2480MHz, ANT

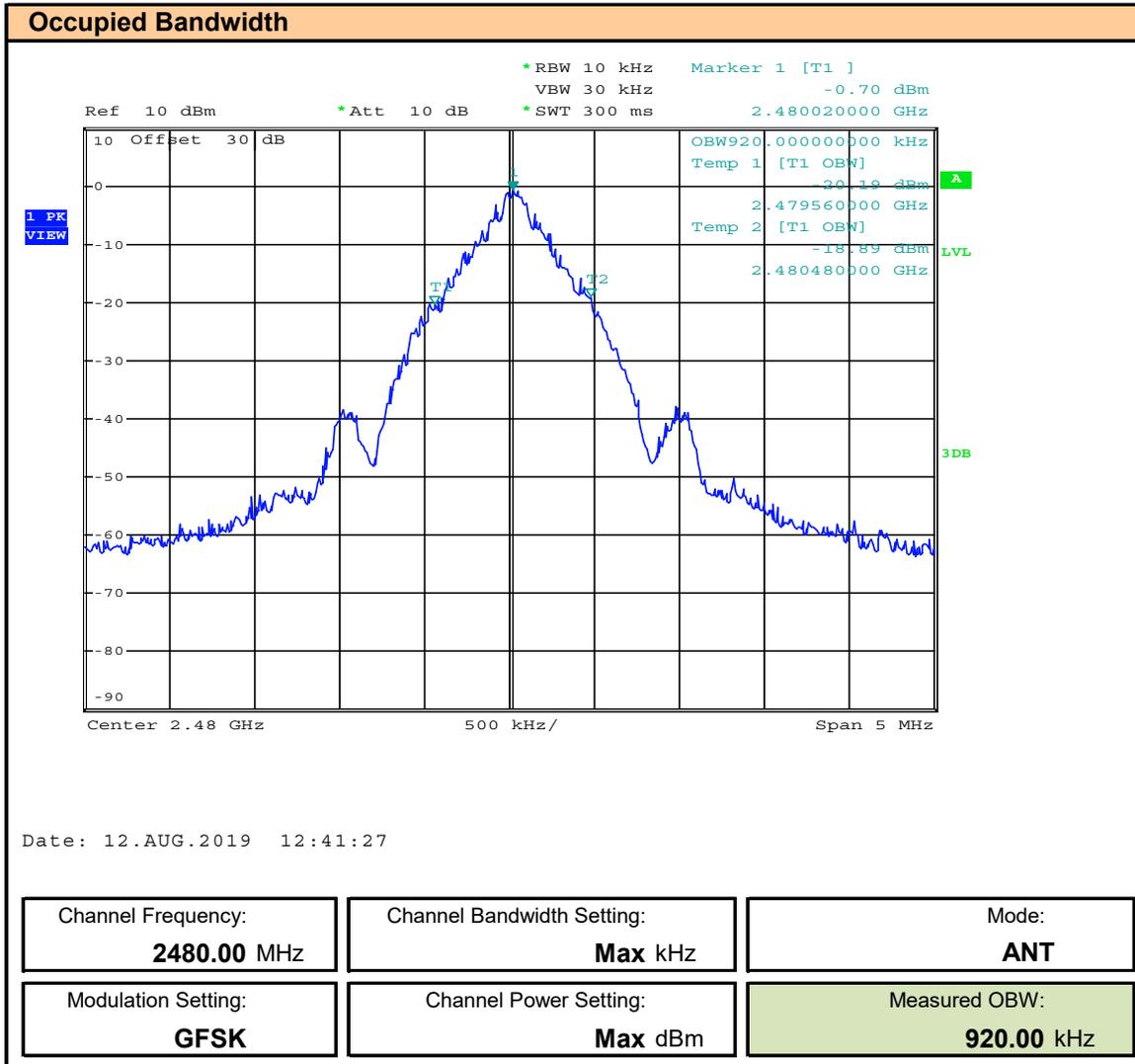


Table 8.1 - Summary of Occupied Bandwidth Measurements

Occupied Bandwidth Measurements					
Frequency (MHz)	Bandwidth Setting (MHz)	Modulation	Mode	Measured OBW (kHz)	Emission Designator
2405.00	Max	GFSK	ANT	920	920KF1D
2440.00				910	910KF1D
2480.00				920	920KF1D
2405.00		GMSK	BLE	1070	1M07F1D
2440.00				1070	1M07F1D
2480.00				1070	1M07F1D

9.0 6DB BANDWIDTH

Test Procedure

Normative Reference	FCC 47 CFR §2.1049, §15.247(a)(2), RSS-Gen (6.7), RSS-247 (5.2)(a), KDB 558074 (8.2), ANSI C63.10 (11.8.2)
----------------------------	---

Limits

47 CFR §15.247(a)(2)	(a) Operation under the provisions of this Section is limited to frequency hopping and digitally modulated intentional radiators that comply with the following provisions: (2) Systems using digital modulation techniques may operate in the 902-928 MHz, 2400-2483.5 MHz, and 5725-5850 MHz bands. The minimum 6 dB bandwidth shall be at least 500 kHz.
RSS-247 (5.2)(a)	5.2 Digital transmission systems DTSs include systems that employ digital modulation techniques resulting in spectral characteristics similar to direct sequence systems. The following applies to the bands 902-928 MHz and 2400 - 2483.5 MHz: a) The minimum 6 dB bandwidth shall be 500 kHz.

General Procedure

KDB 558074 (8.2) C63.10 (11.8.2)	11.8.2 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 above (i.e., RBW = 100 kHz, VBW ≥ 3 X RBW, 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.
-------------------------------------	--

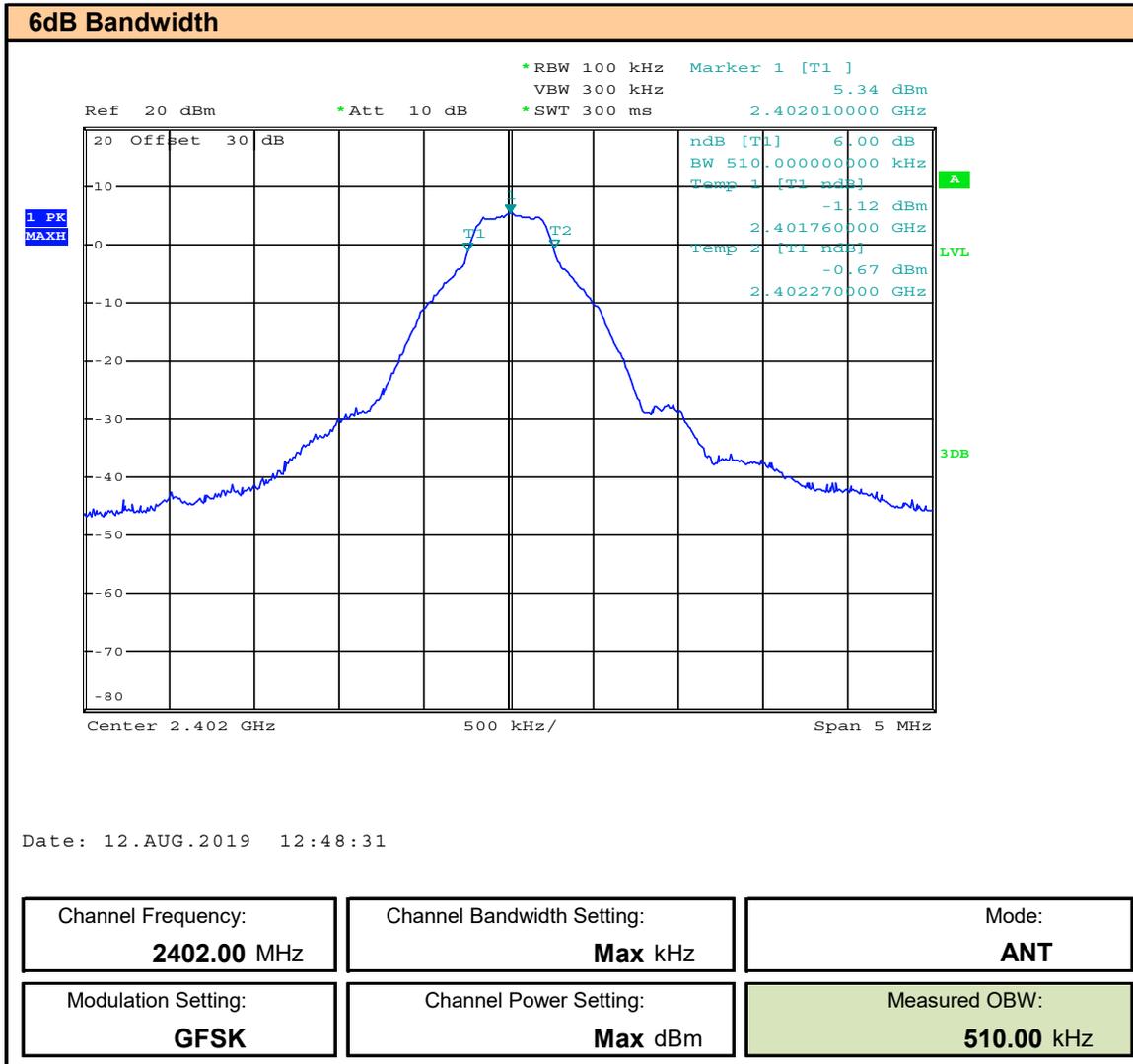
Test Setup

Appendix A - Figure A.1

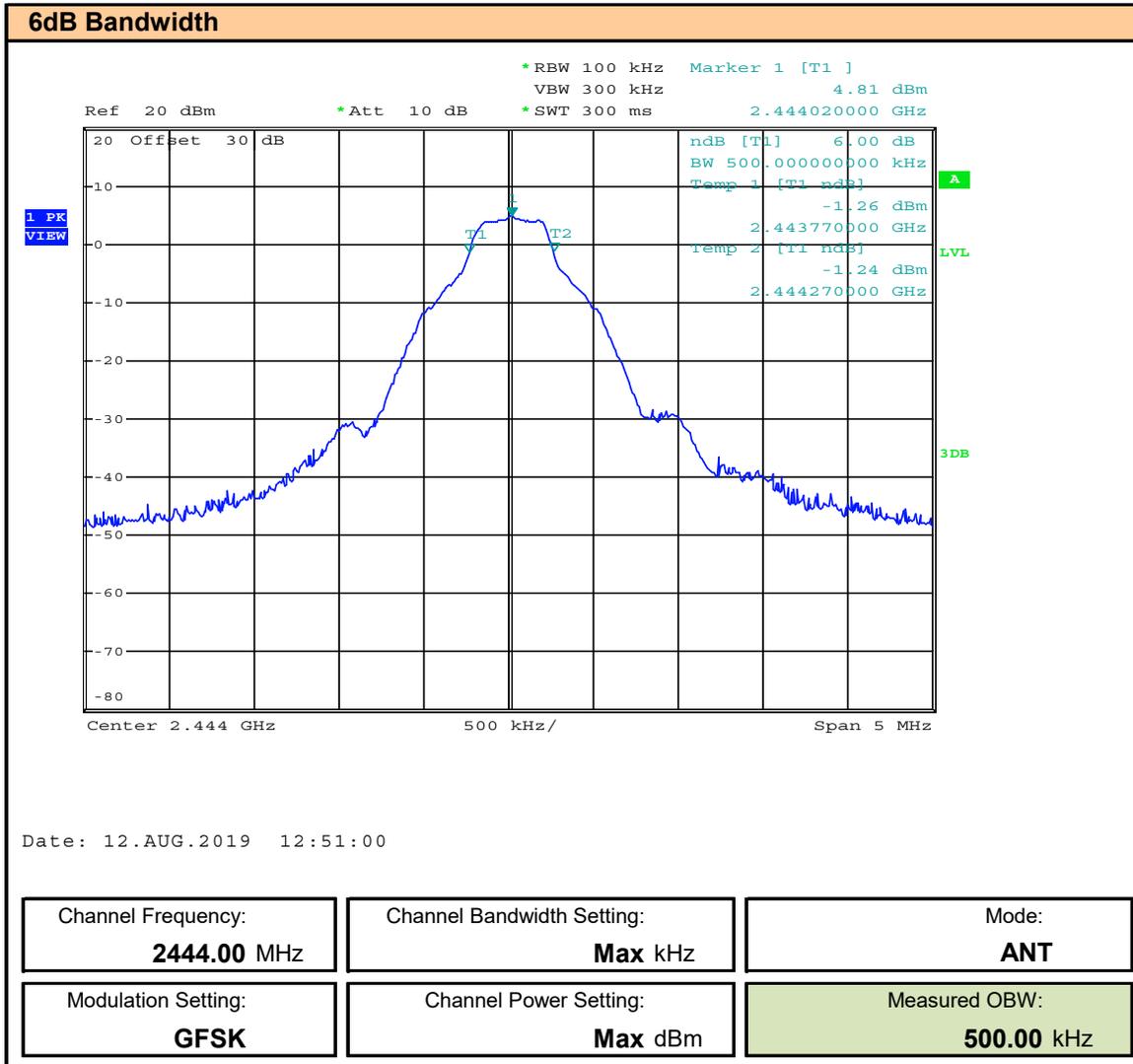
Measurement Procedure

The DUT was connected to a Spectrum Analyzer (SA) via a 30dB attenuator connected to the DUT's antenna port. The SA was configured as above using the Automatic 6dB Cursor Bandwidth measurement. The output power of the DUT was set to the manufacturer's highest output power setting at the Low, Mid and High frequency channels as permitted by the device. The DUT was set to transmit at its maximum Duty Cycle.

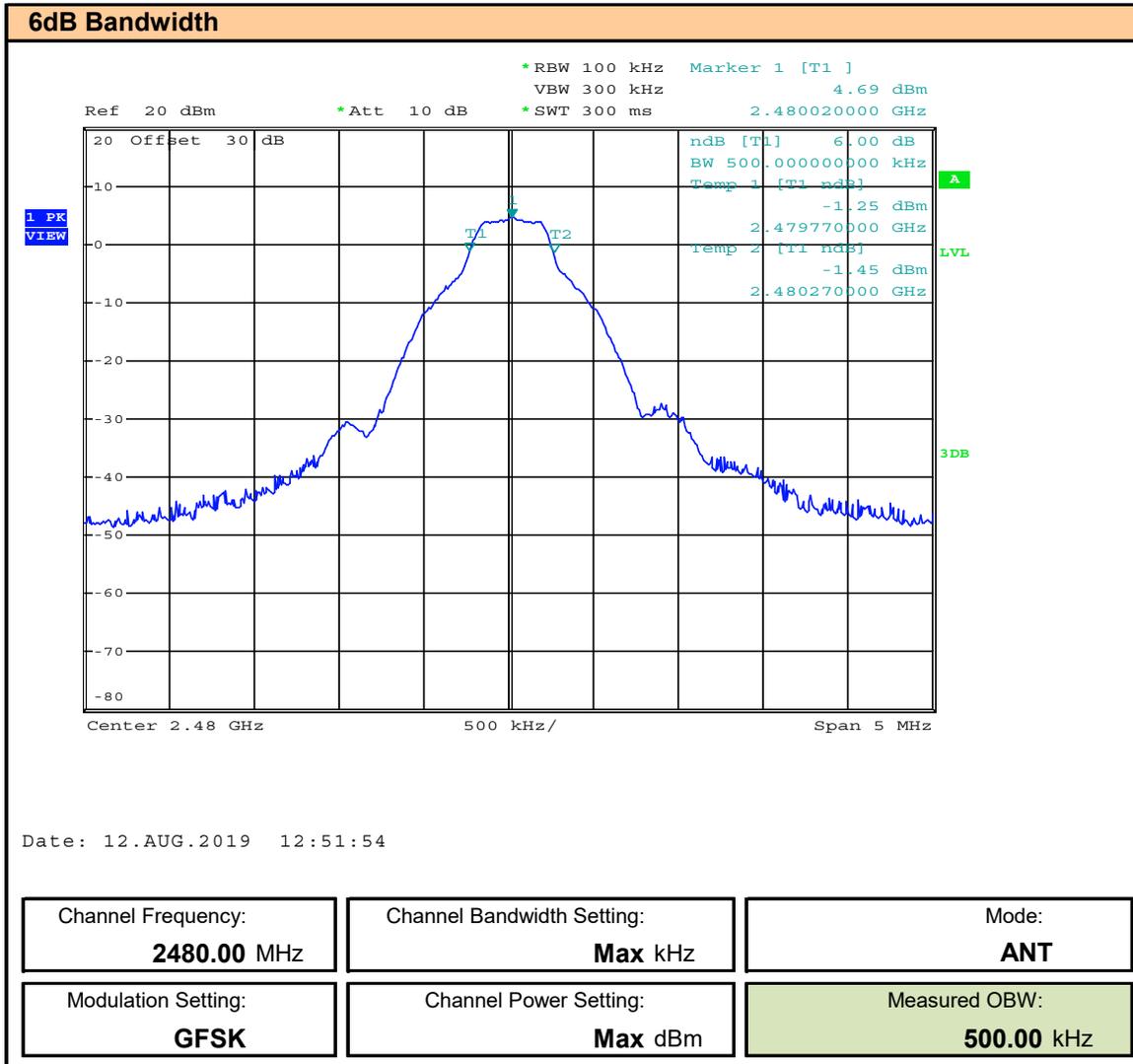
Plot 9.1 – 6dB Bandwidth, 2402MHz, ANT



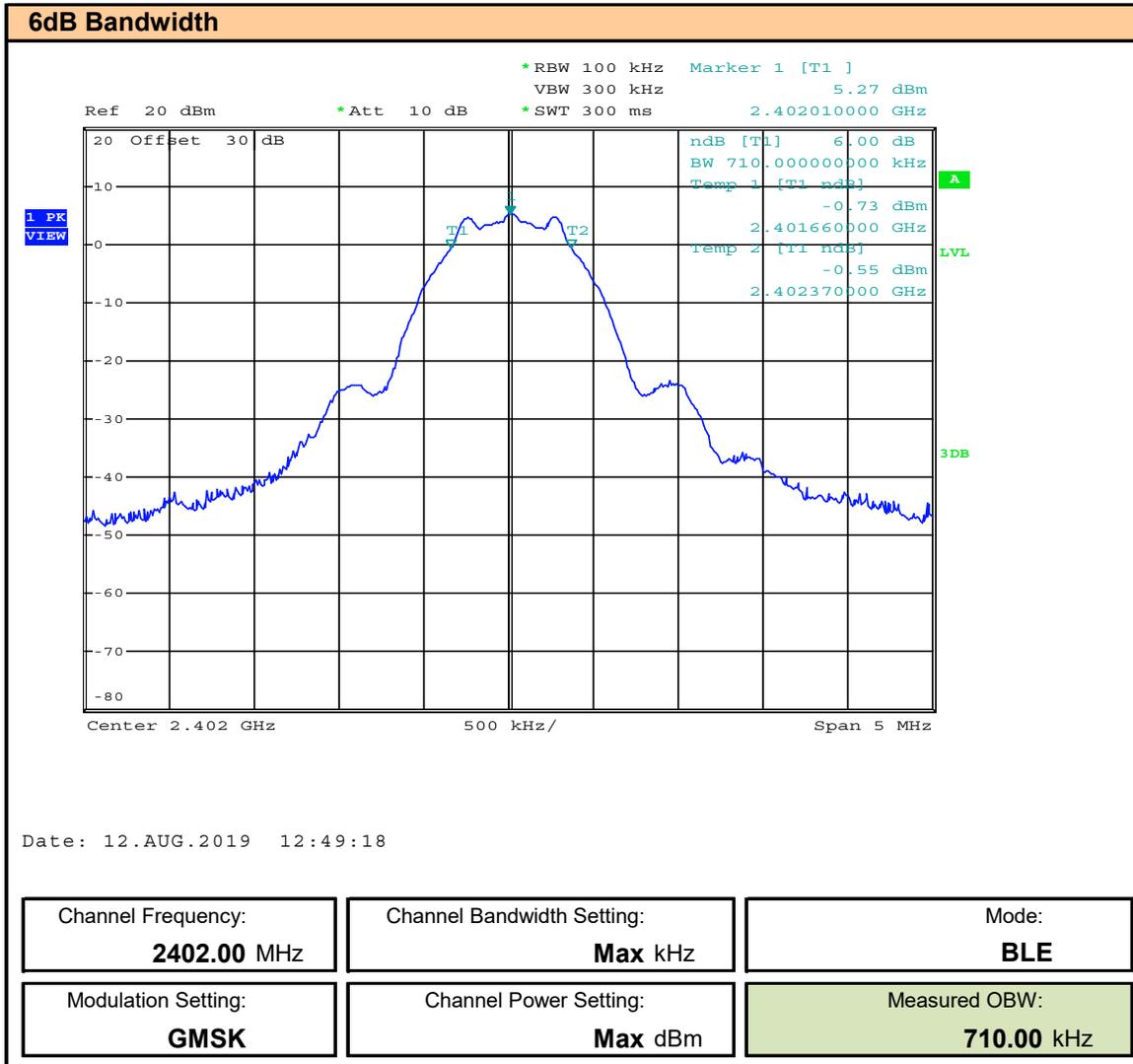
Plot 9.2 – 6dB Bandwidth, 2444MHz, ANT



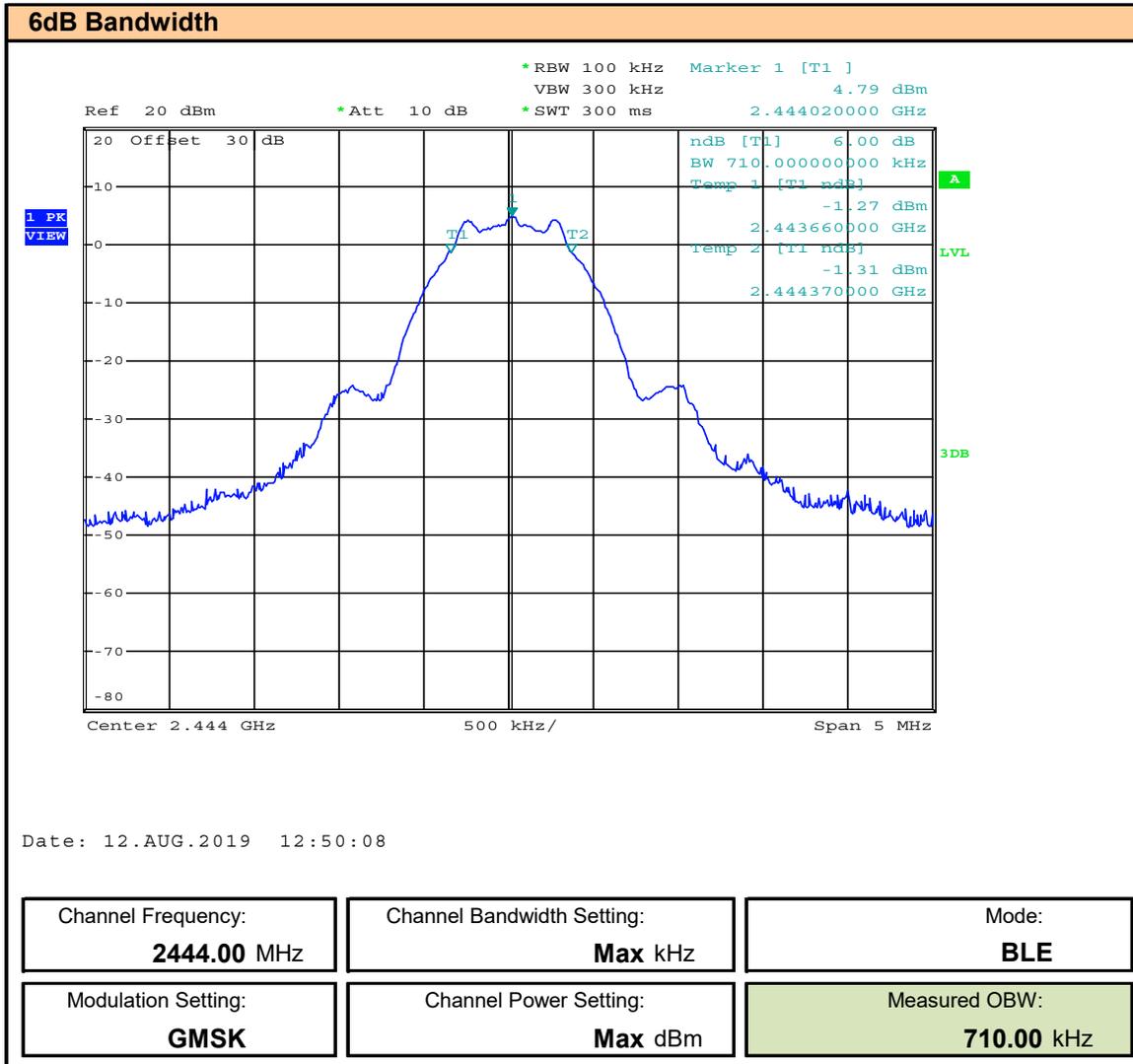
Plot 9.3 – 6dB Bandwidth, 2480MHz, ANT



Plot 9.4 – 6dB Bandwidth, 2402MHz, BLE



Plot 9.5 – 6dB Bandwidth, 2444MHz, BLE



Plot 9.6 – 6dB Bandwidth, 2480MHz, BLE

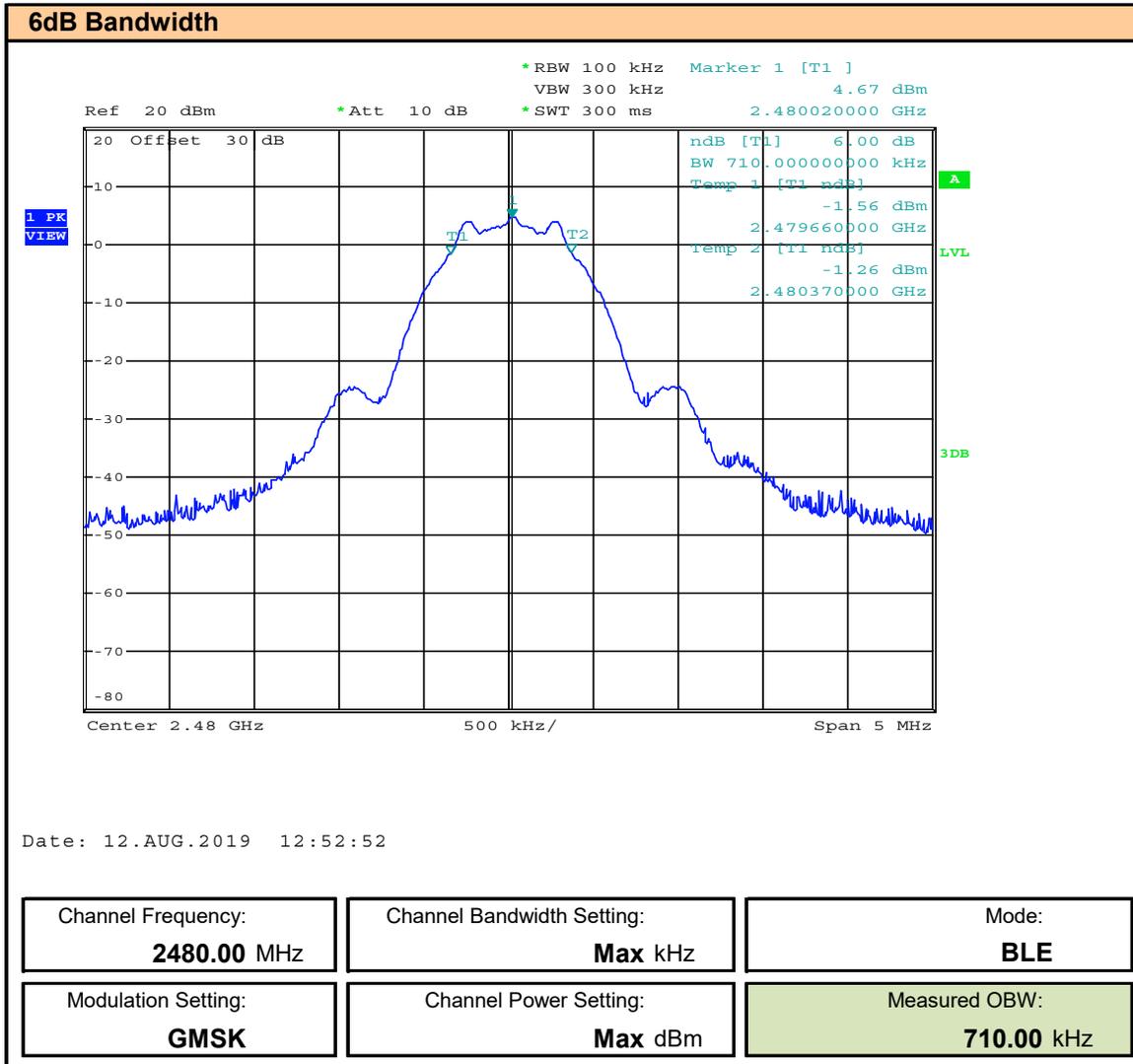


Table 9.1 - Summary of 6dB Bandwidth Measurements

6dB Bandwidth Measurements				
Frequency (MHz)	Bandwidth Setting (MHz)	Modulation	Mode	Measured OBW (kHz)
2405.00	Max	GFSK	ANT	510
2440.00				500
2480.00				500
2405.00		GMSK	BLE	710
2440.00				710
2480.00				710

10.0 FIELD STRENGTH

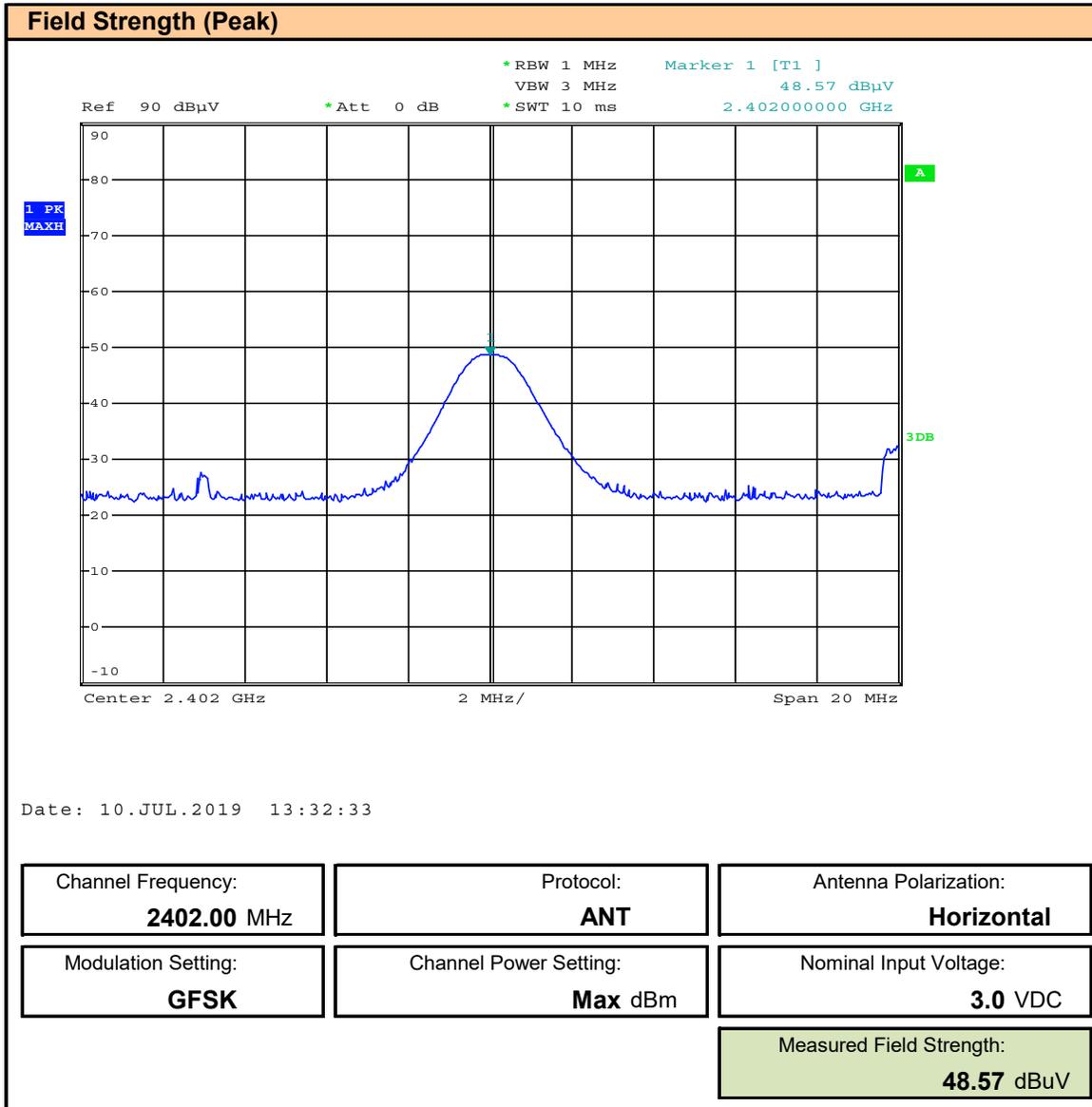
Test Procedure	
Normative Reference	FCC 47 CFR §2.1046
	KDB 558074 (8.3.2), ANSI C63.10 (11.9.2.2.6)

General Procedure	
C63.10 (6.5.4)	<p>6.5.4 Final radiated emission tests</p> <p>Using the orientation and equipment arrangement of the EUT, and based on the measurement results found during the exploratory measurement in 6.5.3, the EUT arrangement, appropriate modulation, and modes of operation that produce the emissions that have the highest amplitude relative to the limit shall be selected for the final measurement. The final measurement shall follow all the procedures in 6.3 with the EUT operating on frequencies per 5.6. For each mode selected, record the frequency and amplitude of the highest fundamental emission (if applicable) and the frequency and amplitude of the six highest spurious emissions relative to the limit; emissions more than 20 dB below the limit do not need to be reported.</p> <p>Measurements are performed with the EUT rotated from 0° to 360°, the antenna height scanned between 1 m and 4 m, and the antenna rotated to repeat the measurements for both the horizontal and vertical antenna polarizations. Variations in cable or wire placement shall be explored to maximize the measured emissions.</p>

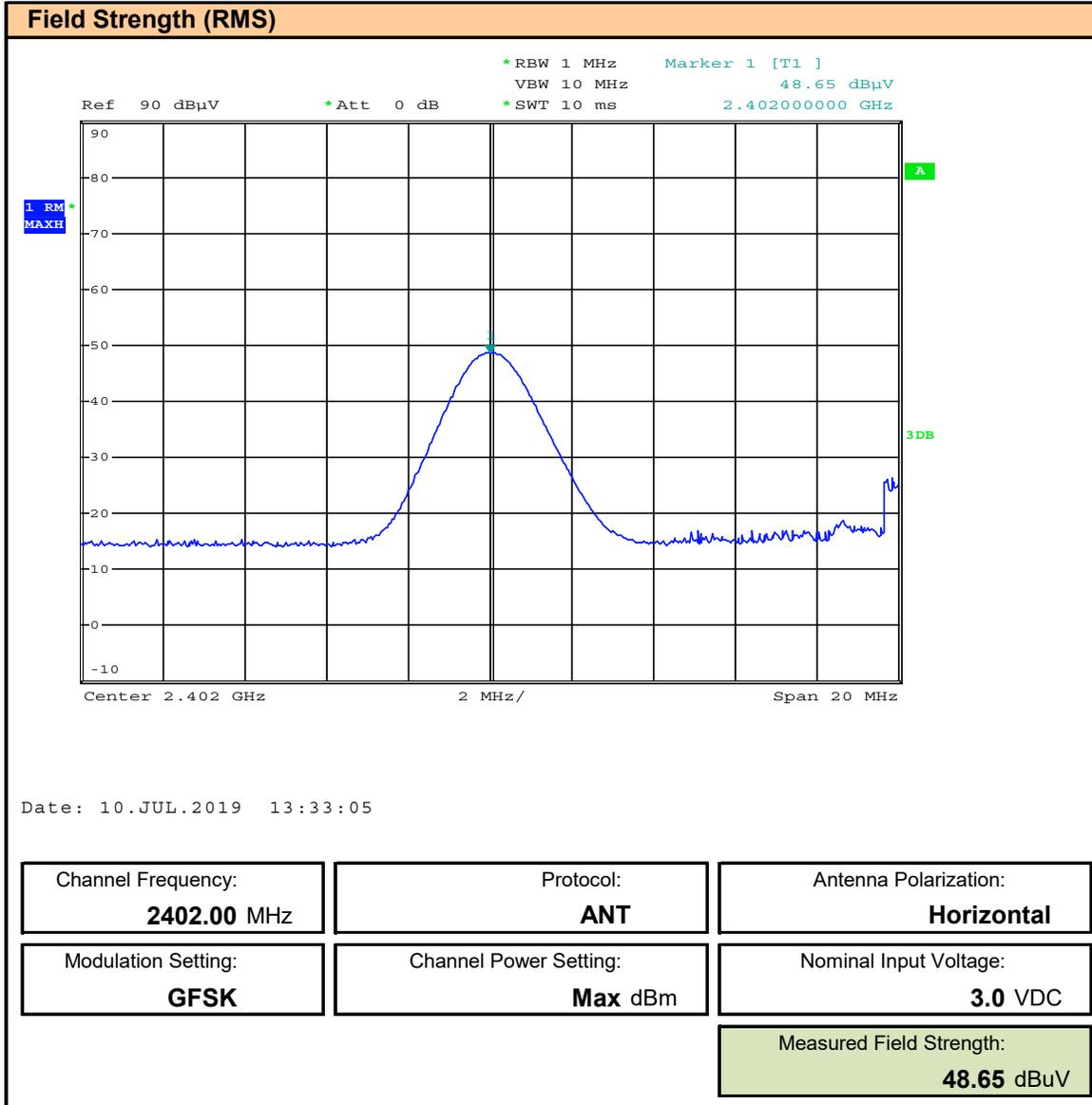
Test Setup	Appendix A	Figure A.2
-------------------	-------------------	-------------------

Measurement Procedure
The DUT place on a 80cm high turntable on an Open Area Test Site (OATS) at a distance of 3m from the measurement antenna. The DUT was set to transmit at maximum power and duty cycle. The DUT was rotated 360 degrees and scanned with the receive antenna elevated from 1 to 4m. The emissions were measured and recorded.

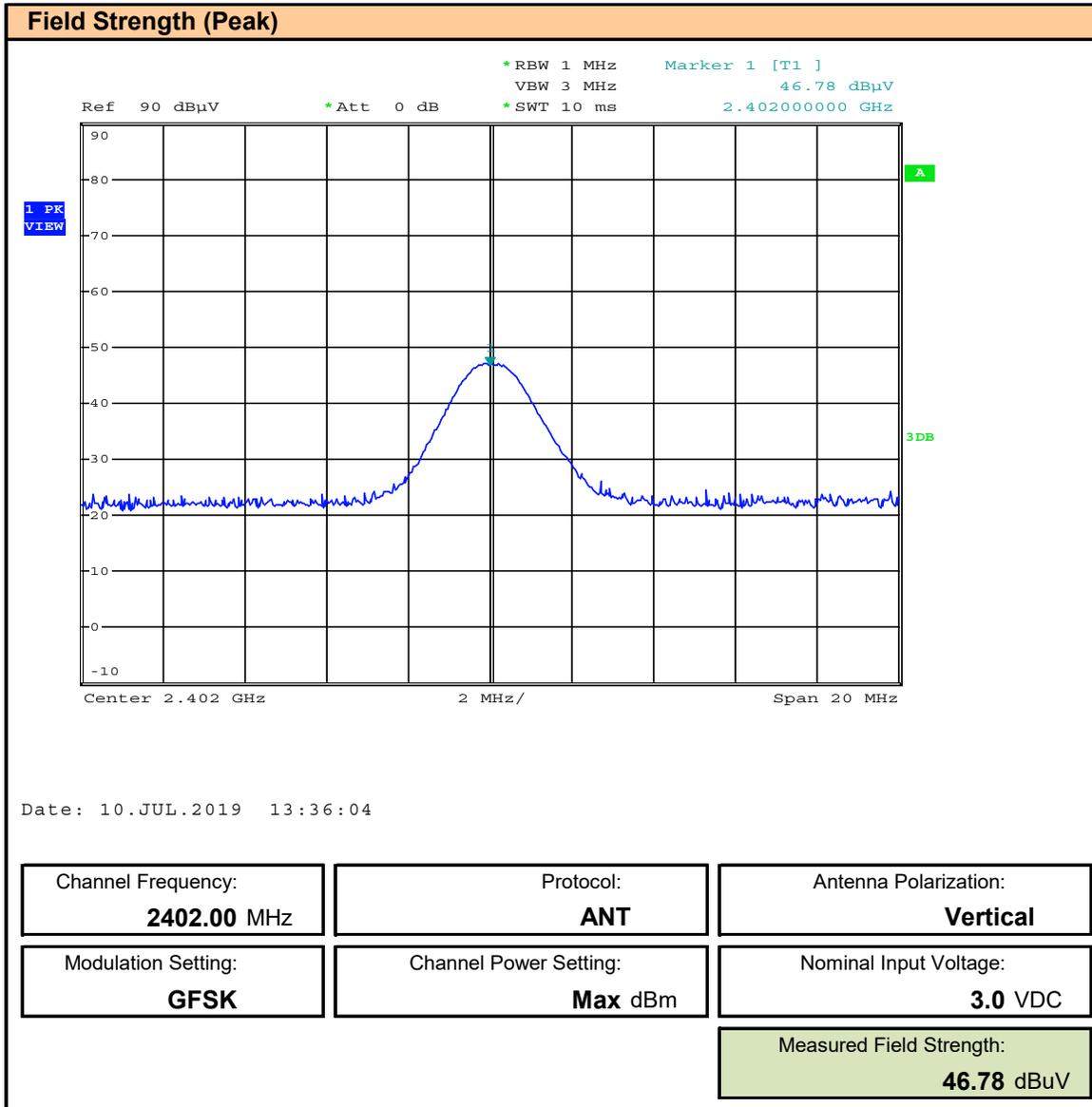
Plot 10.1 – Field Strength, ANT, 2402MHz, Horizontal, Peak



Plot 10.2 – Field Strength, ANT, 2402MHz, Horizontal, RMS



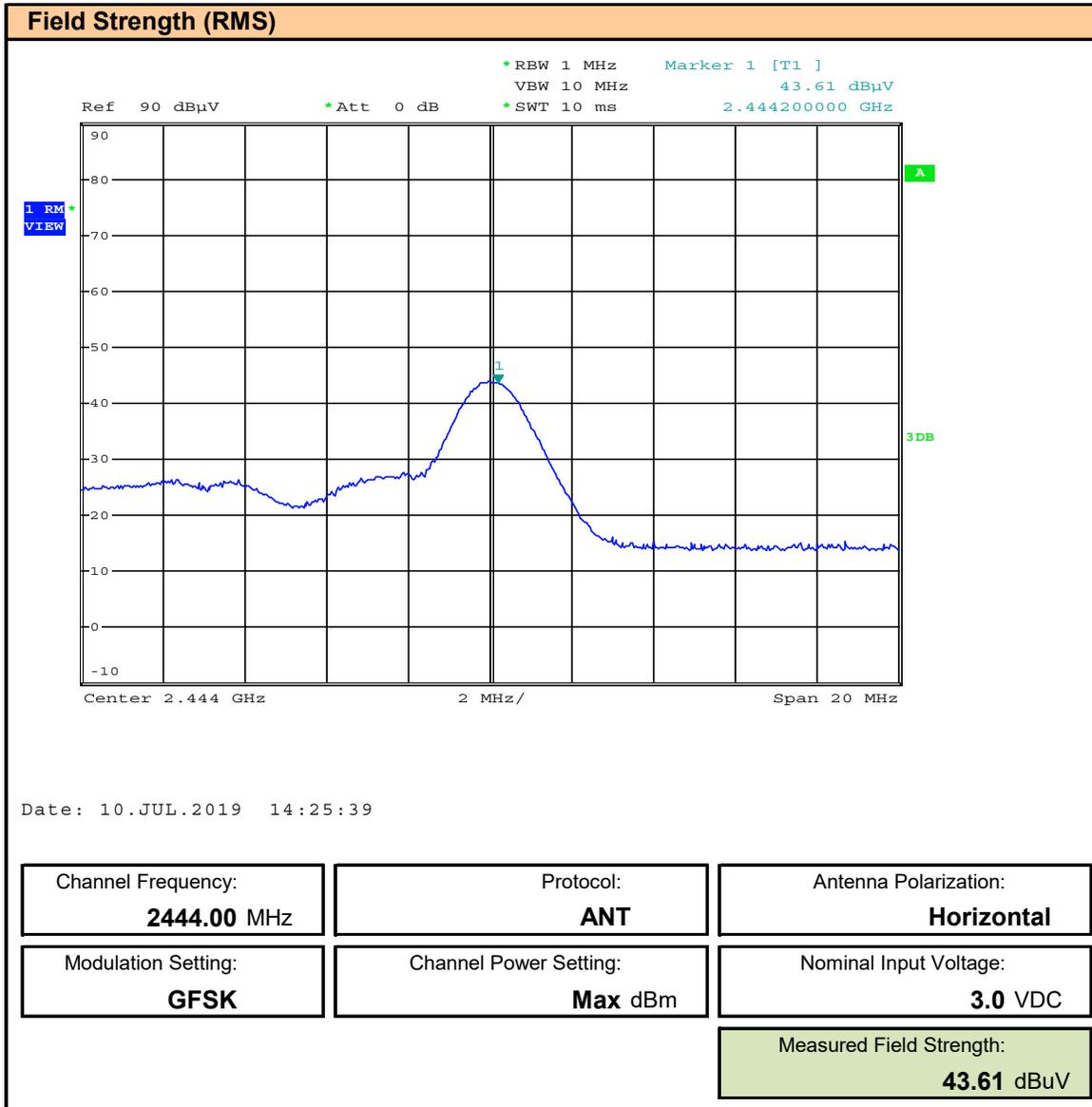
Plot 10.3 – Field Strength, ANT, 2402MHz, Vertical, Peak



Plot 10.5 – Field Strength, ANT, 2444MHz, Horizontal, Peak



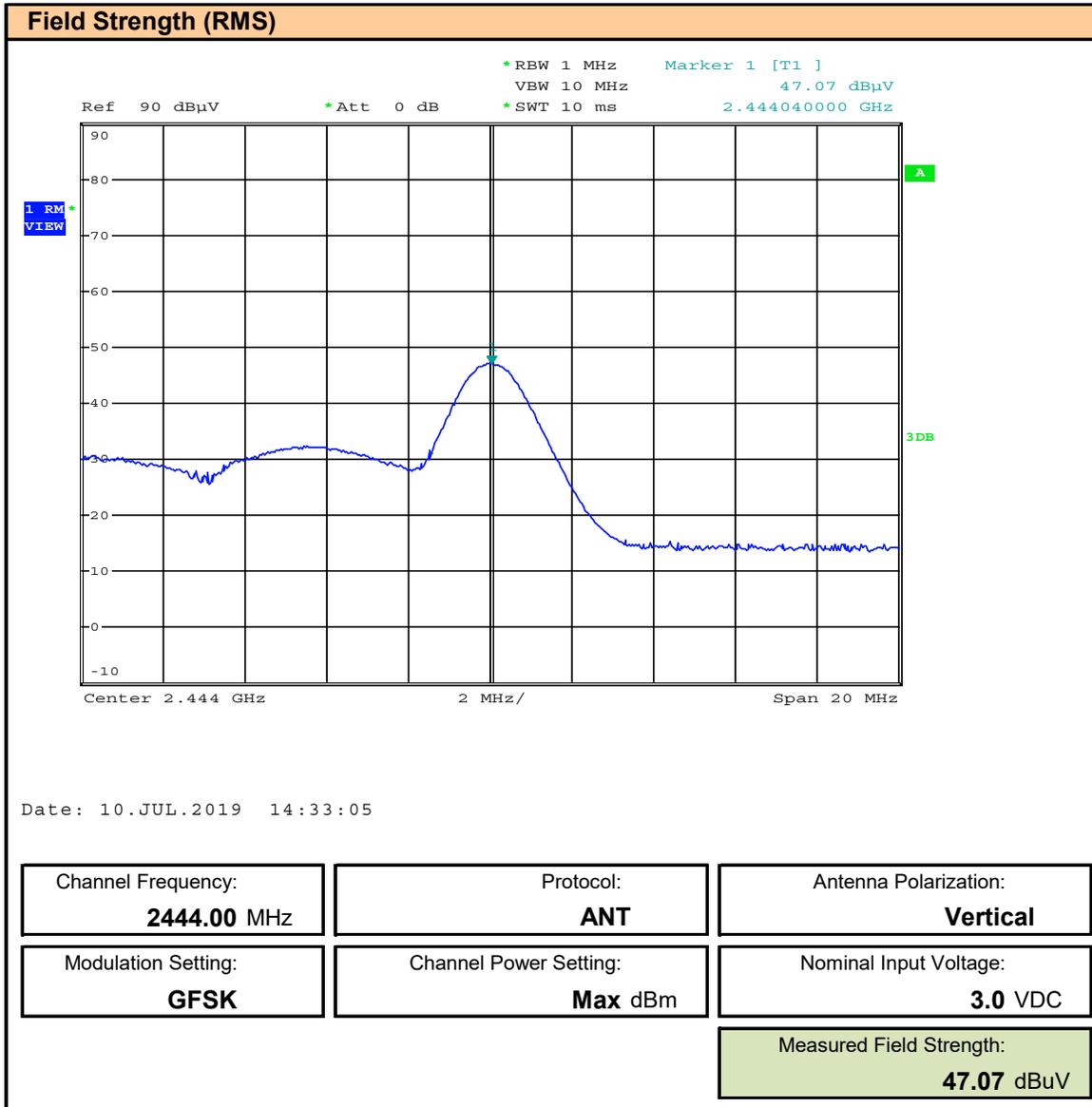
Plot 10.6 – Field Strength, ANT, 2444MHz, Horizontal, RMS



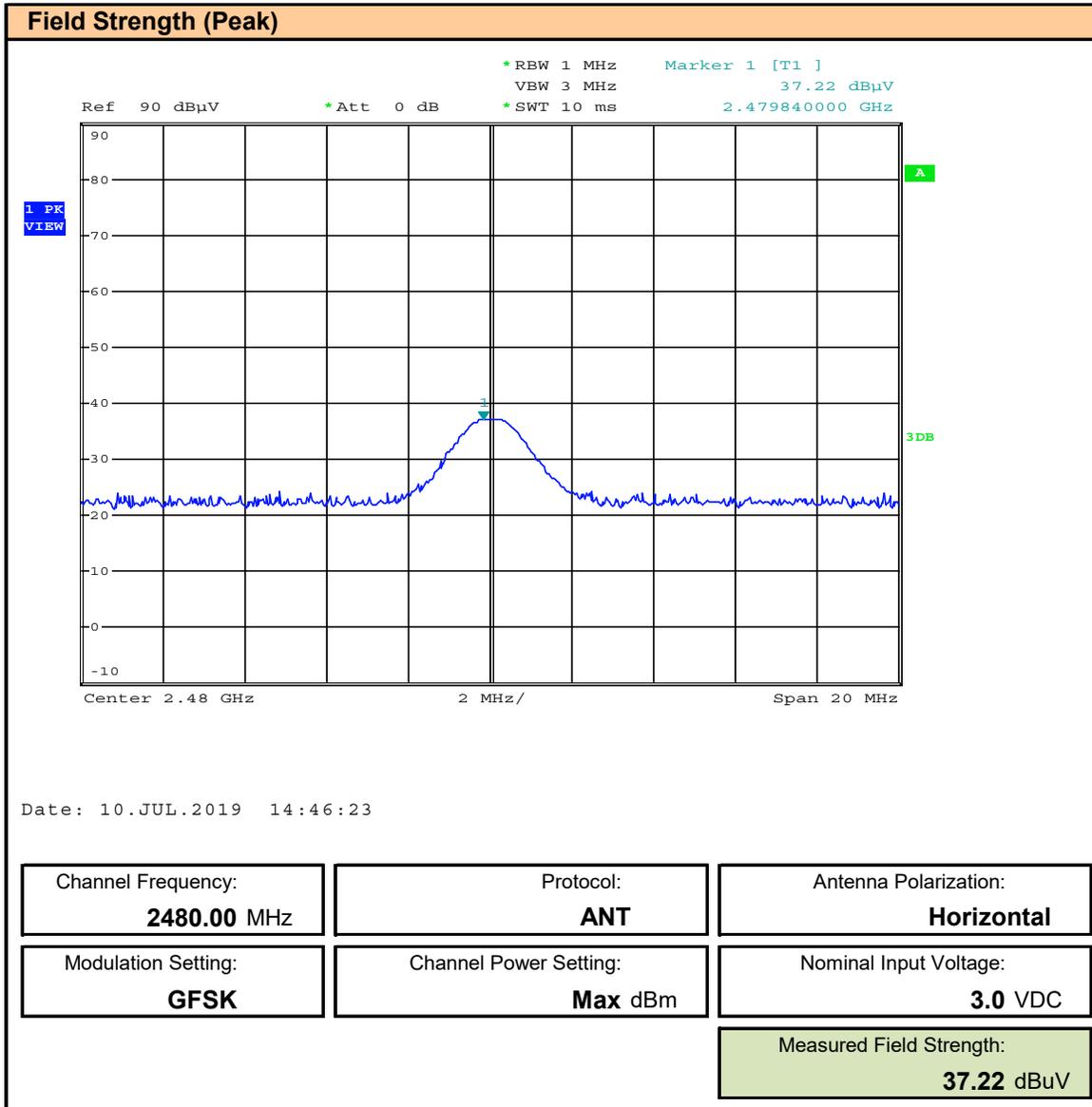
Plot 10.7 – Field Strength, ANT, 2444MHz, Vertical, Peak



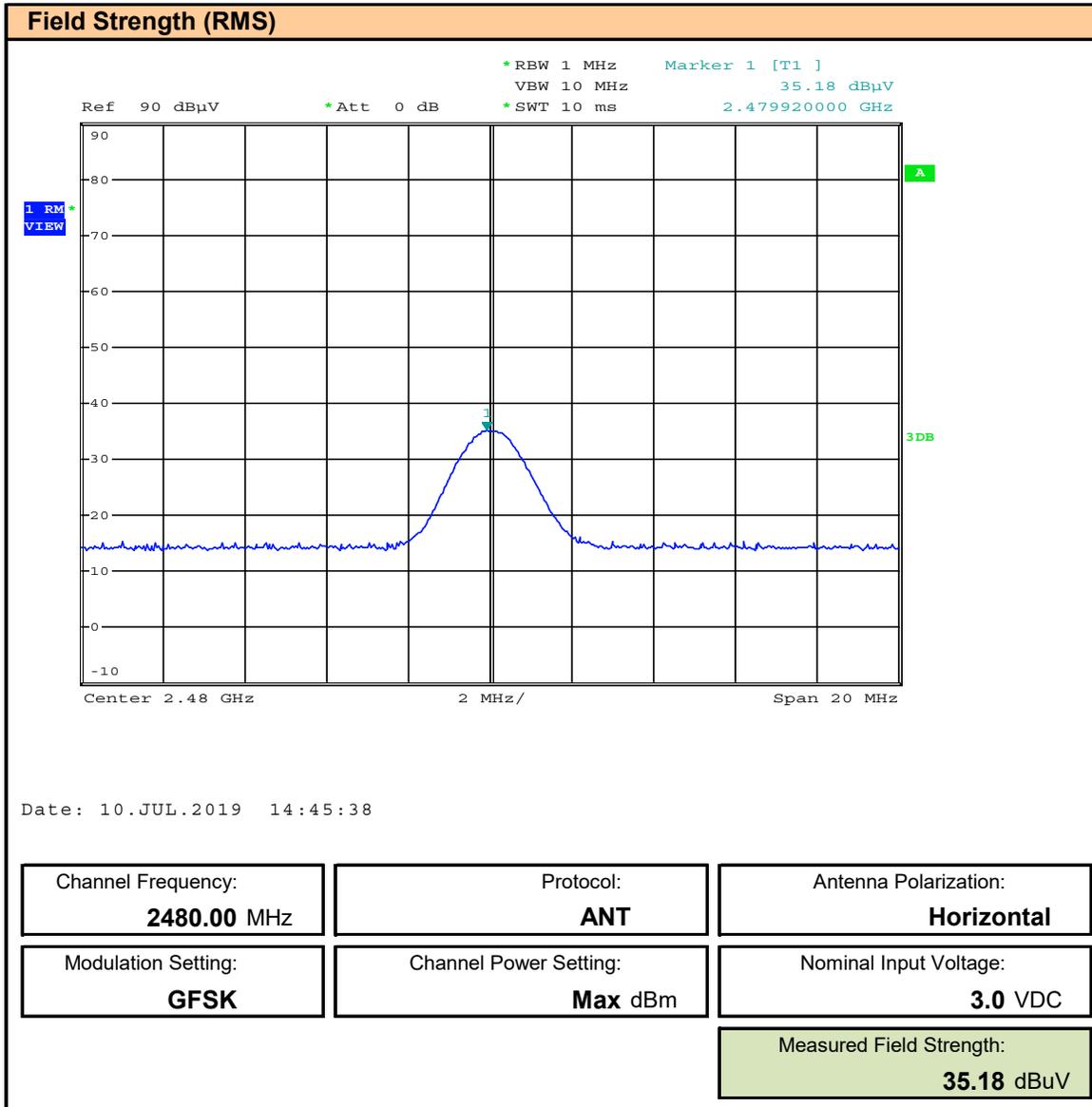
Plot 10.8 – Field Strength, ANT, 2444MHz, Vertical, RMS



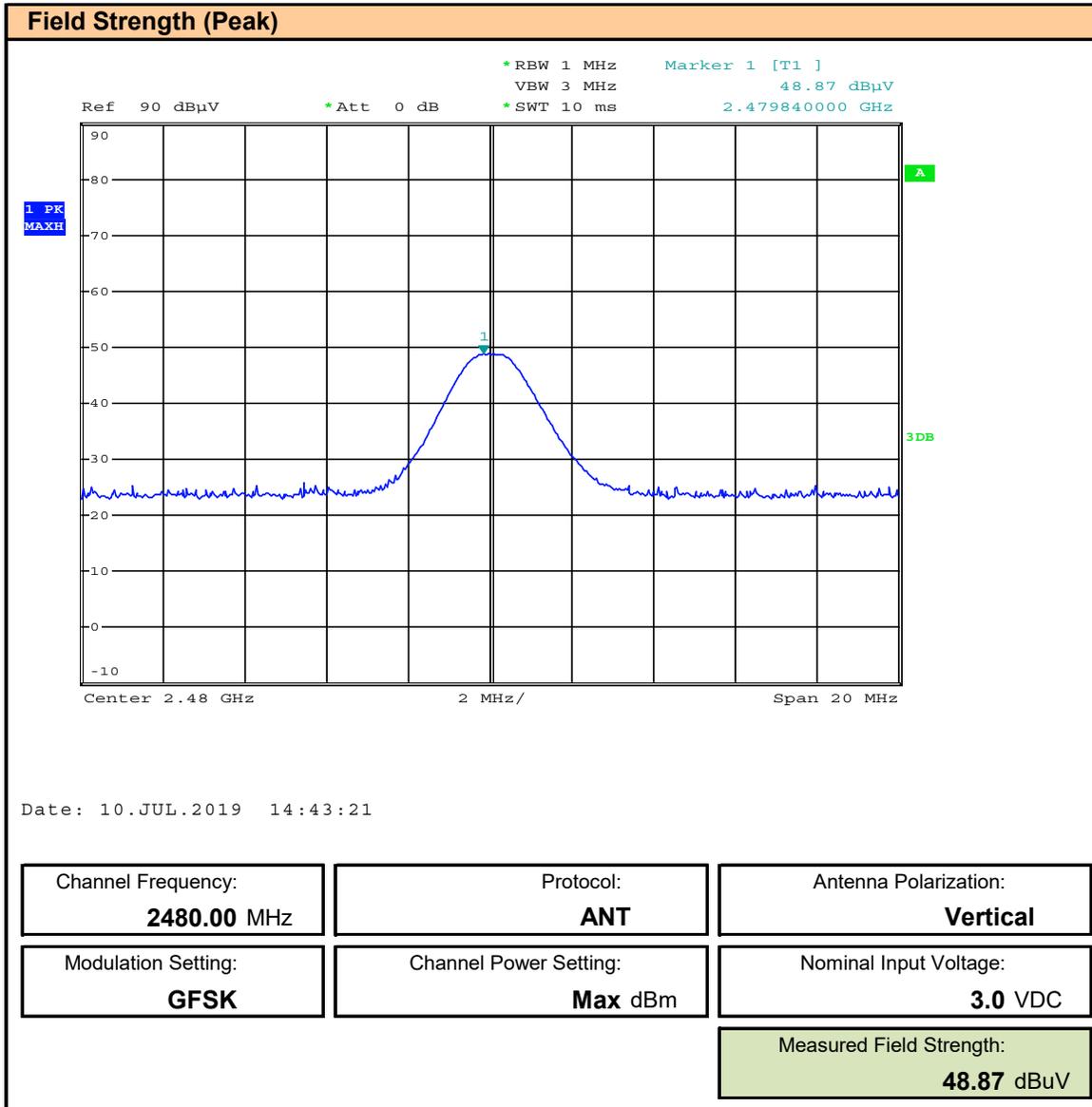
Plot 10.9 – Field Strength, ANT, 2480MHz, Horizontal, Peak



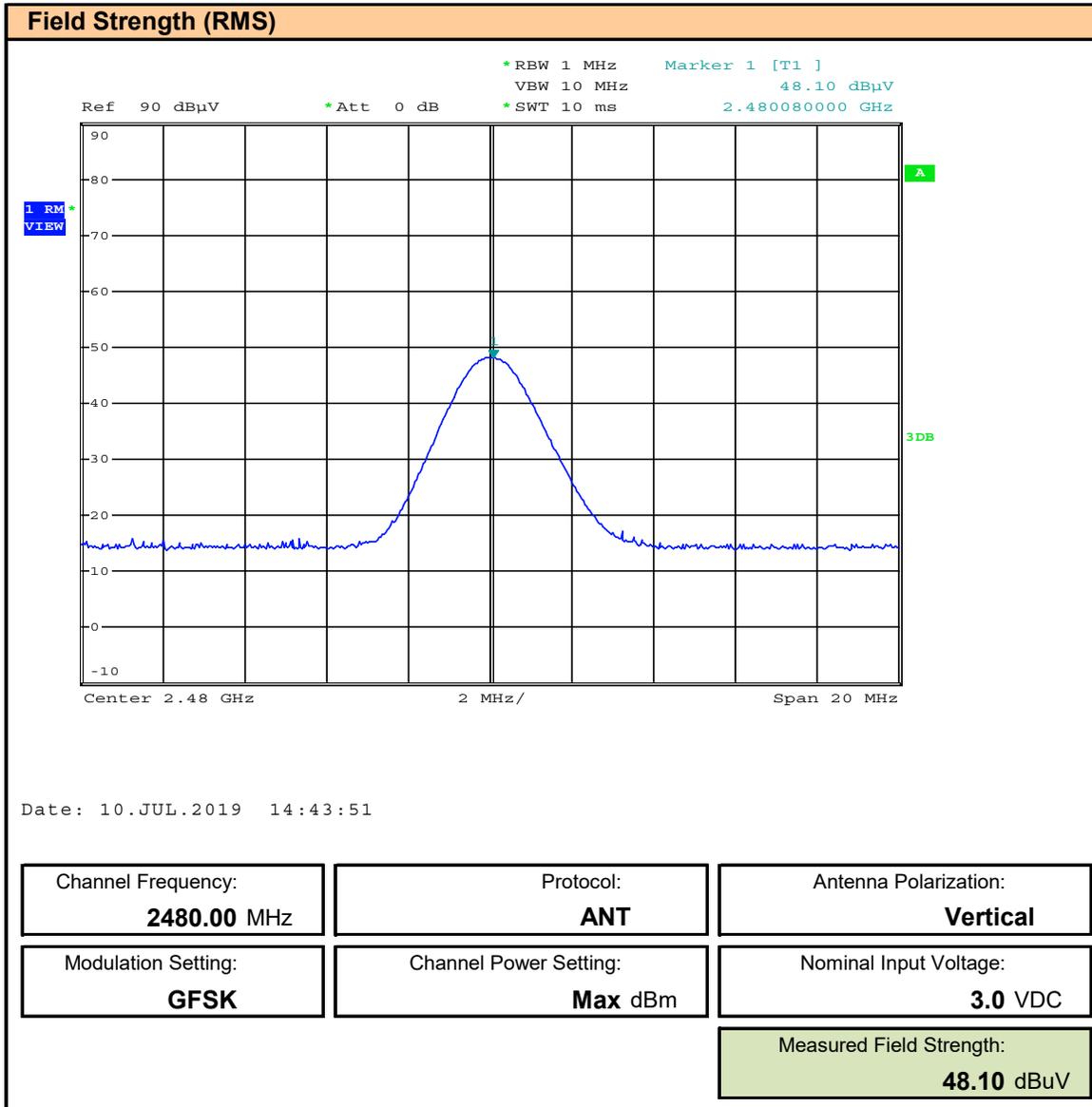
Plot 10.10 – Field Strength, ANT, 2480MHz, Horizontal, RMS



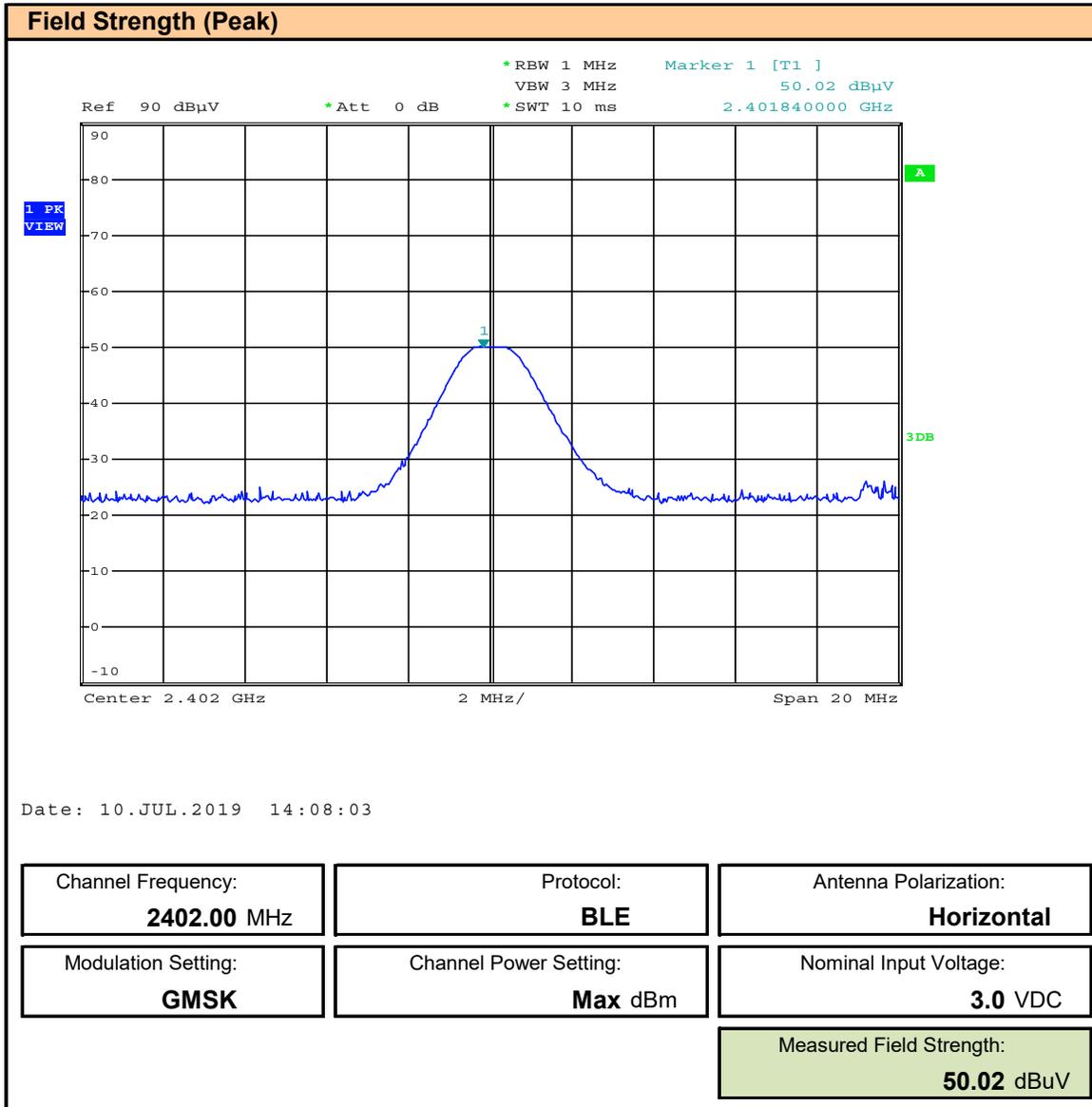
Plot 10.11 – Field Strength, ANT, 2480MHz, Vertical, Peak



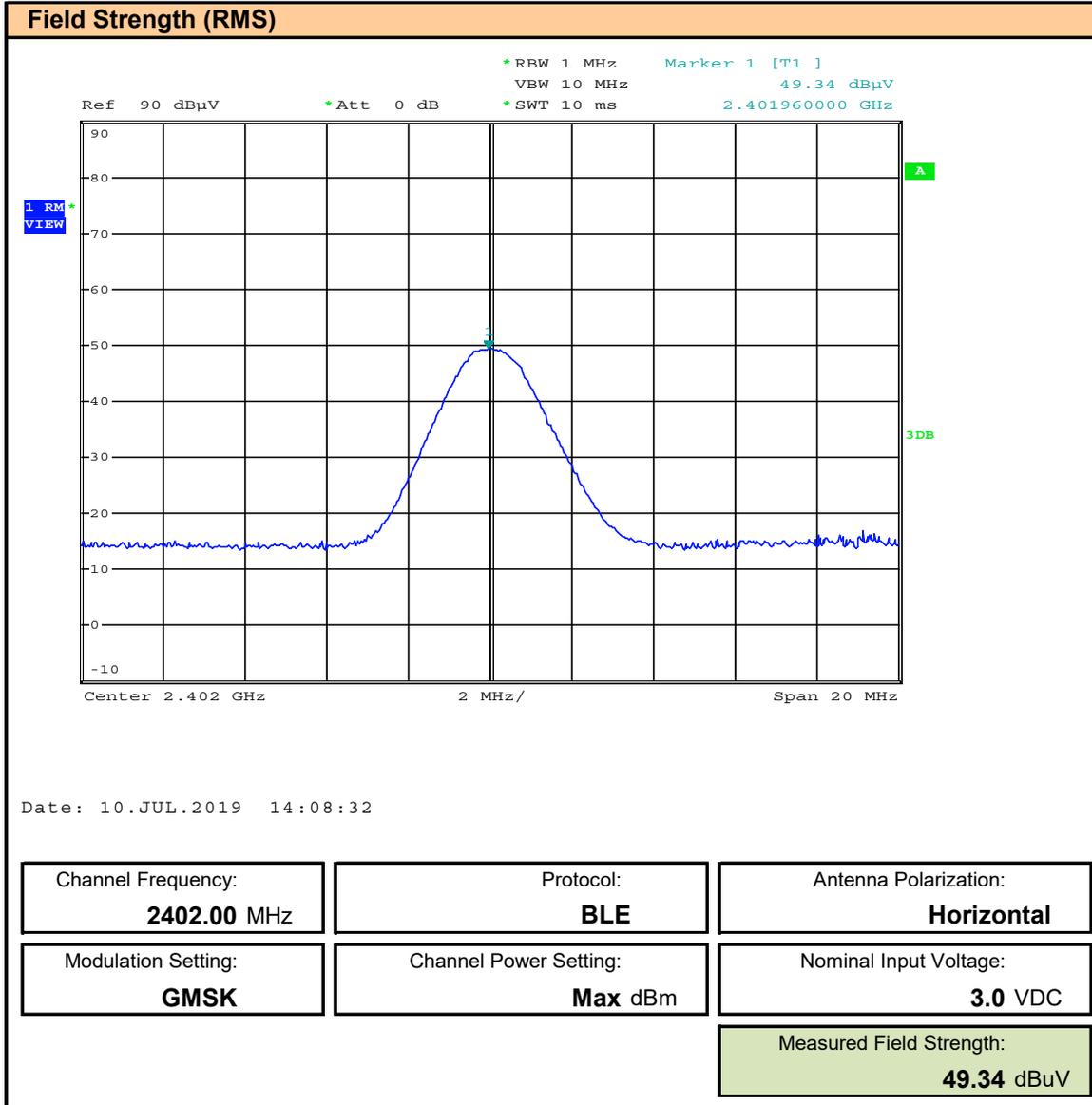
Plot 10.12 – Field Strength, ANT, 2480MHz, Vertical, RMS



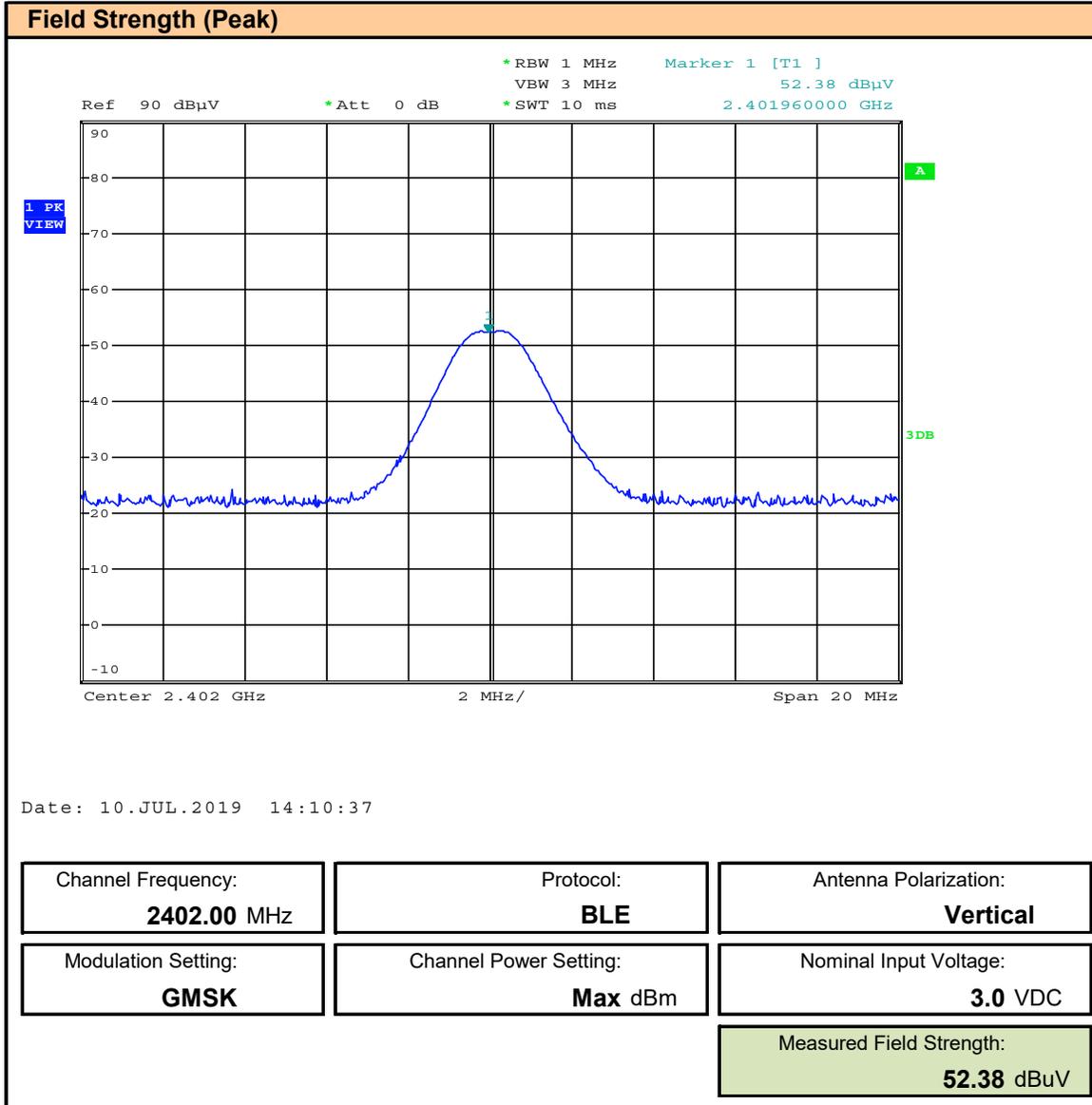
Plot 10.13 – Field Strength, BLE, 2402MHz, Horizontal, Peak



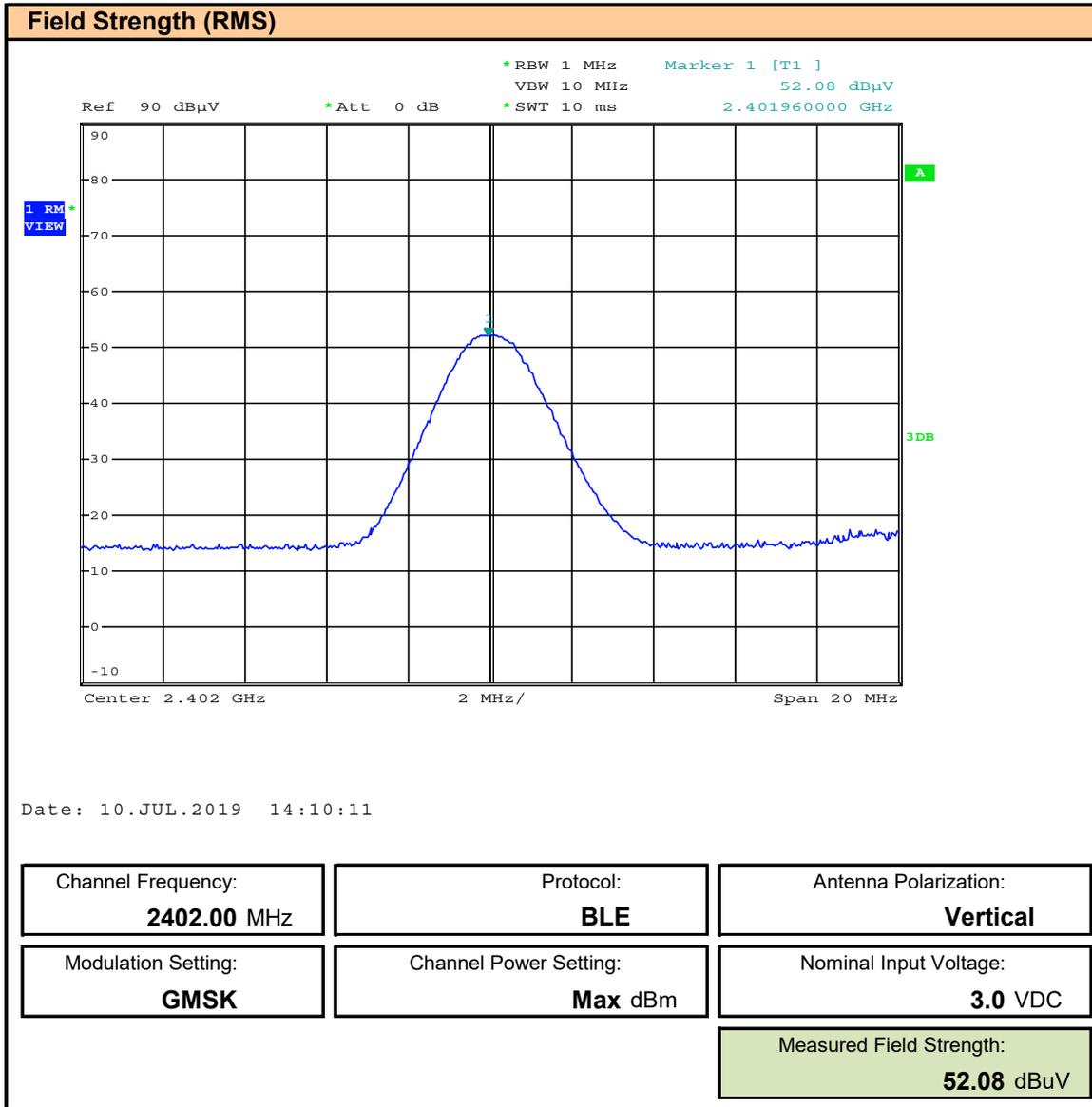
Plot 10.14 – Field Strength, BLE, 2402MHz, Horizontal, RMS



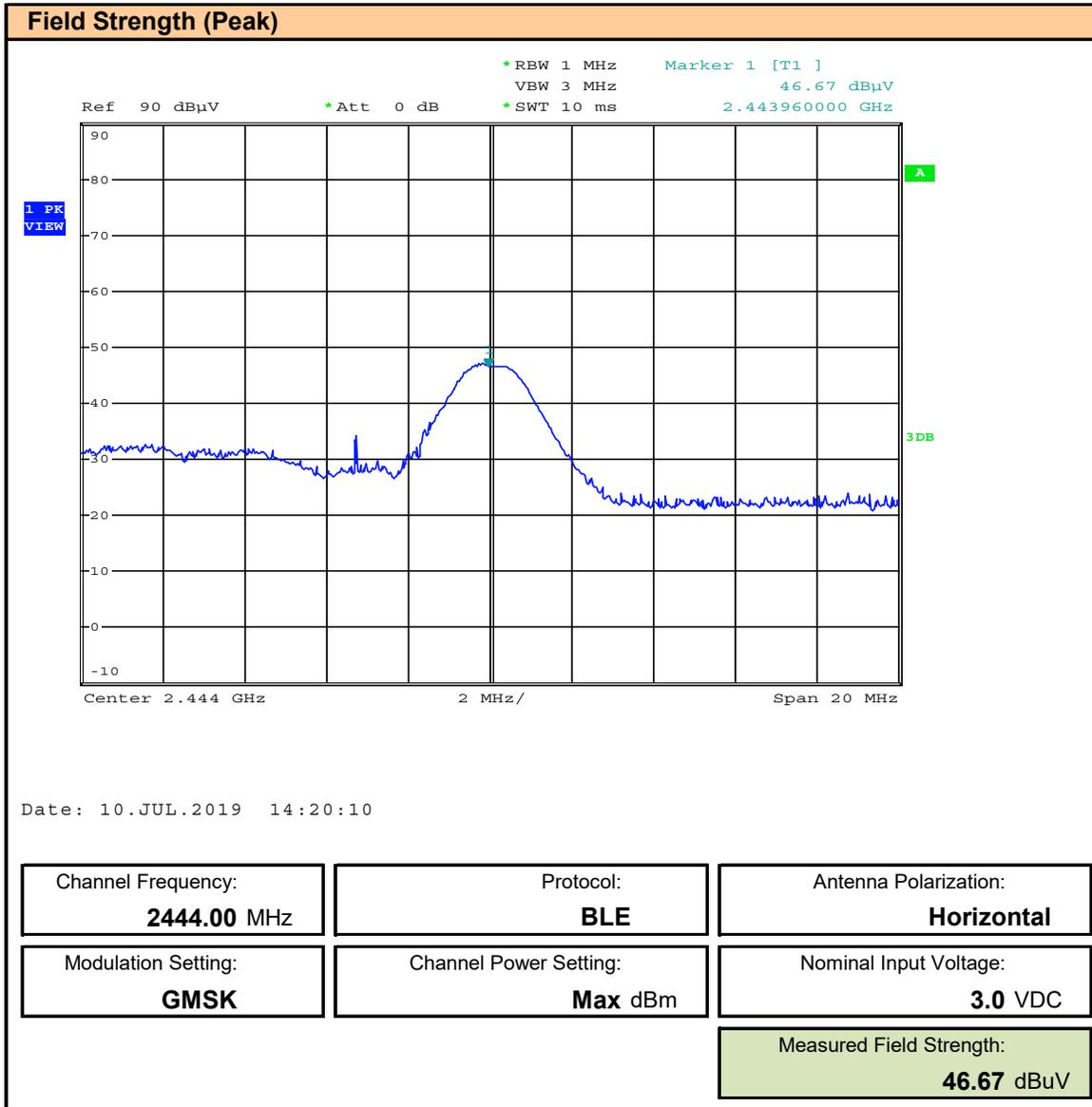
Plot 10.15 – Field Strength, BLE, 2402MHz, Vertical, Peak



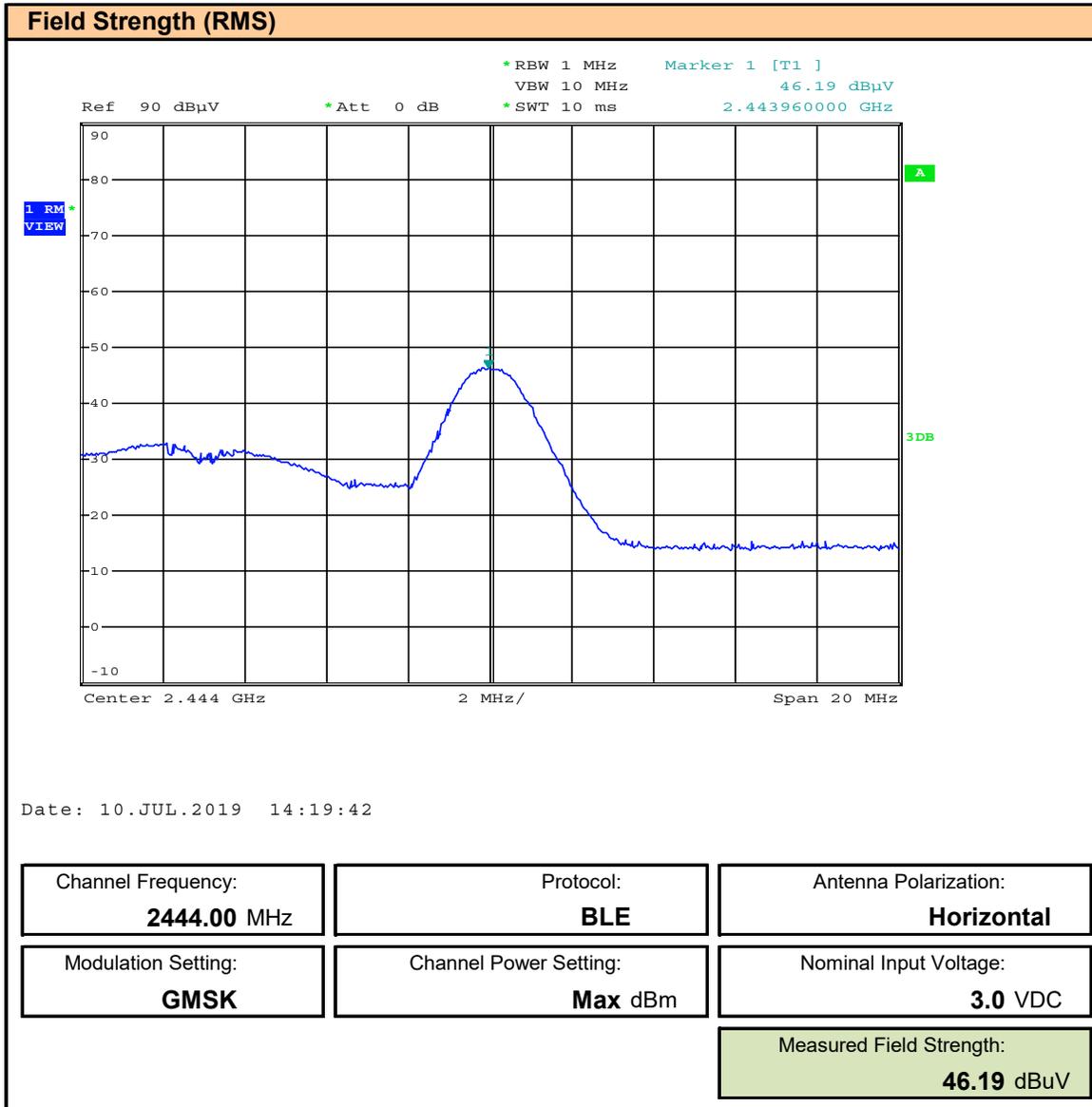
Plot 10.16 – Field Strength, BLE, 2402MHz, Vertical, RMS



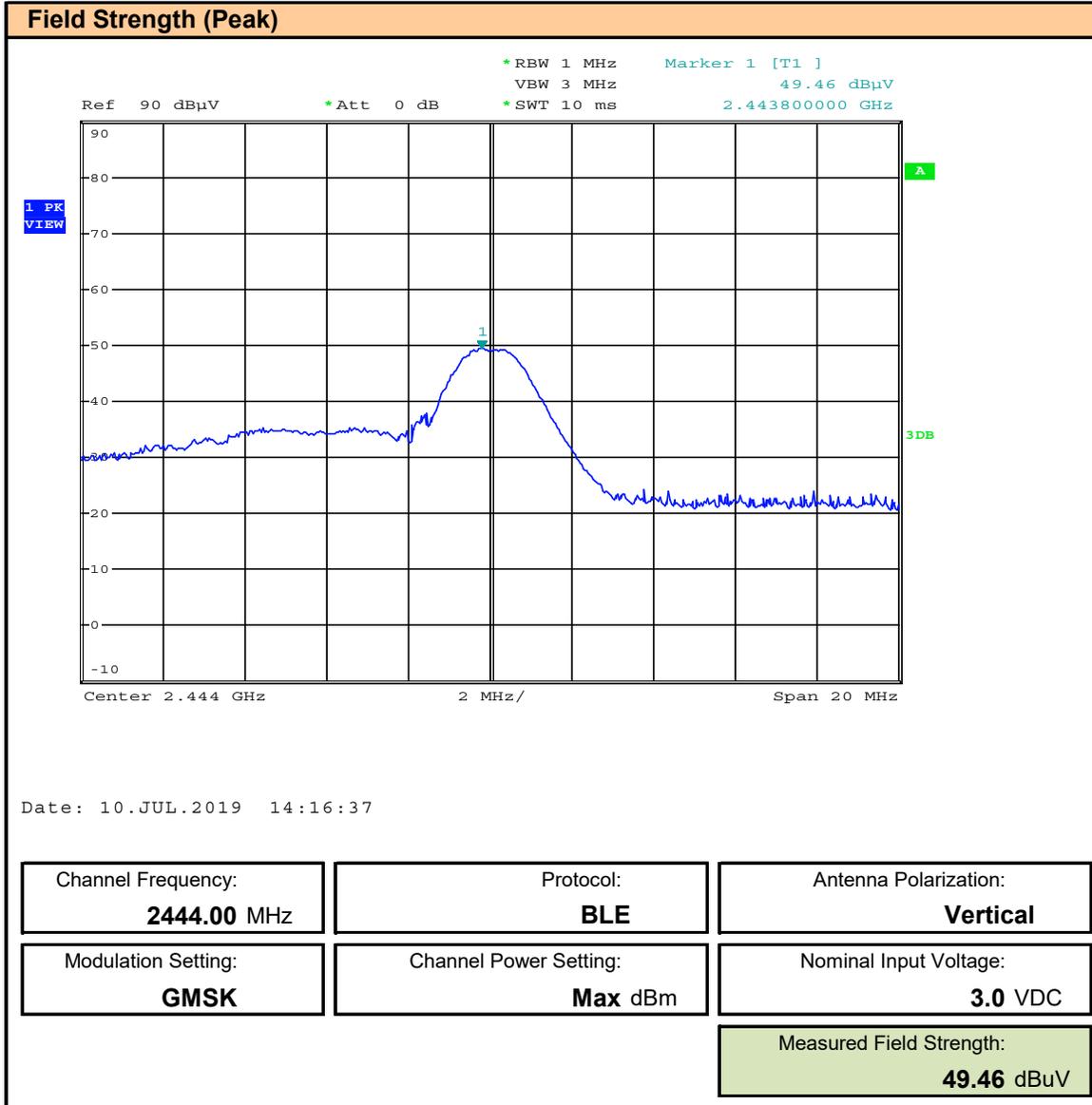
Plot 10.17 – Field Strength, BLE, 2444MHz, Horizontal, Peak



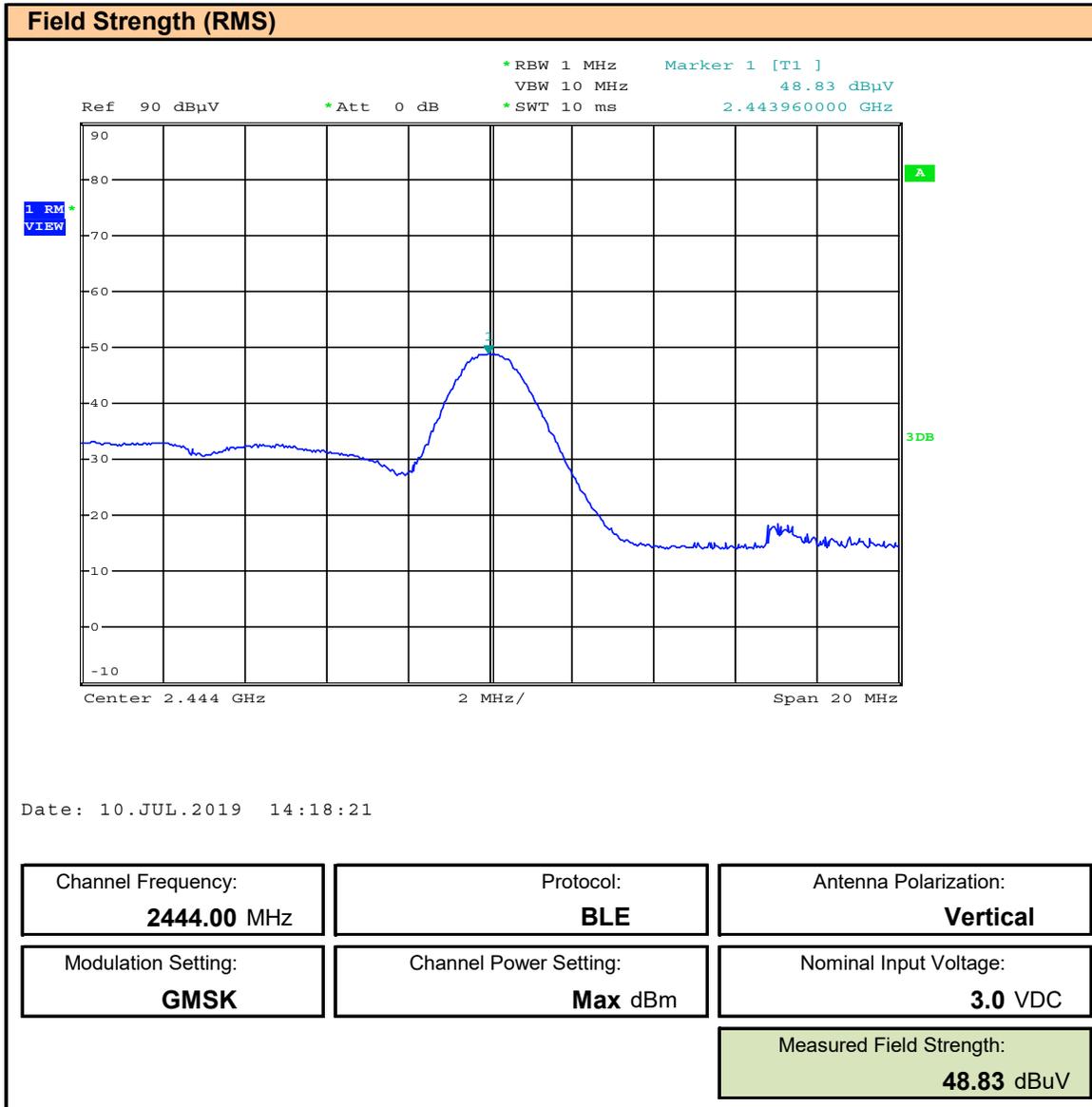
Plot 10.18 – Field Strength, BLE, 2444MHz, Horizontal, RMS



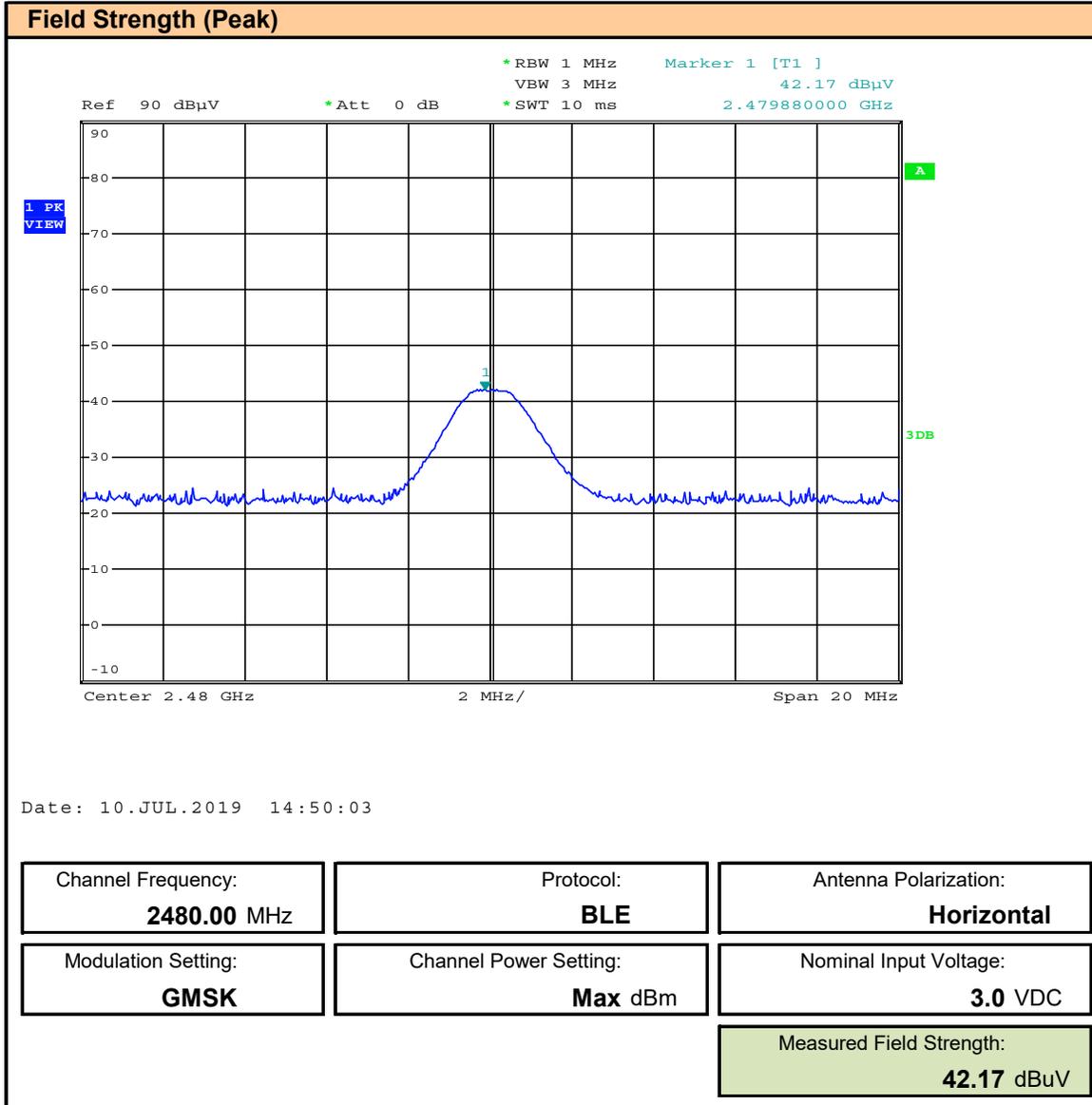
Plot 10.19 – Field Strength, BLE, 2444MHz, Vertical, Peak



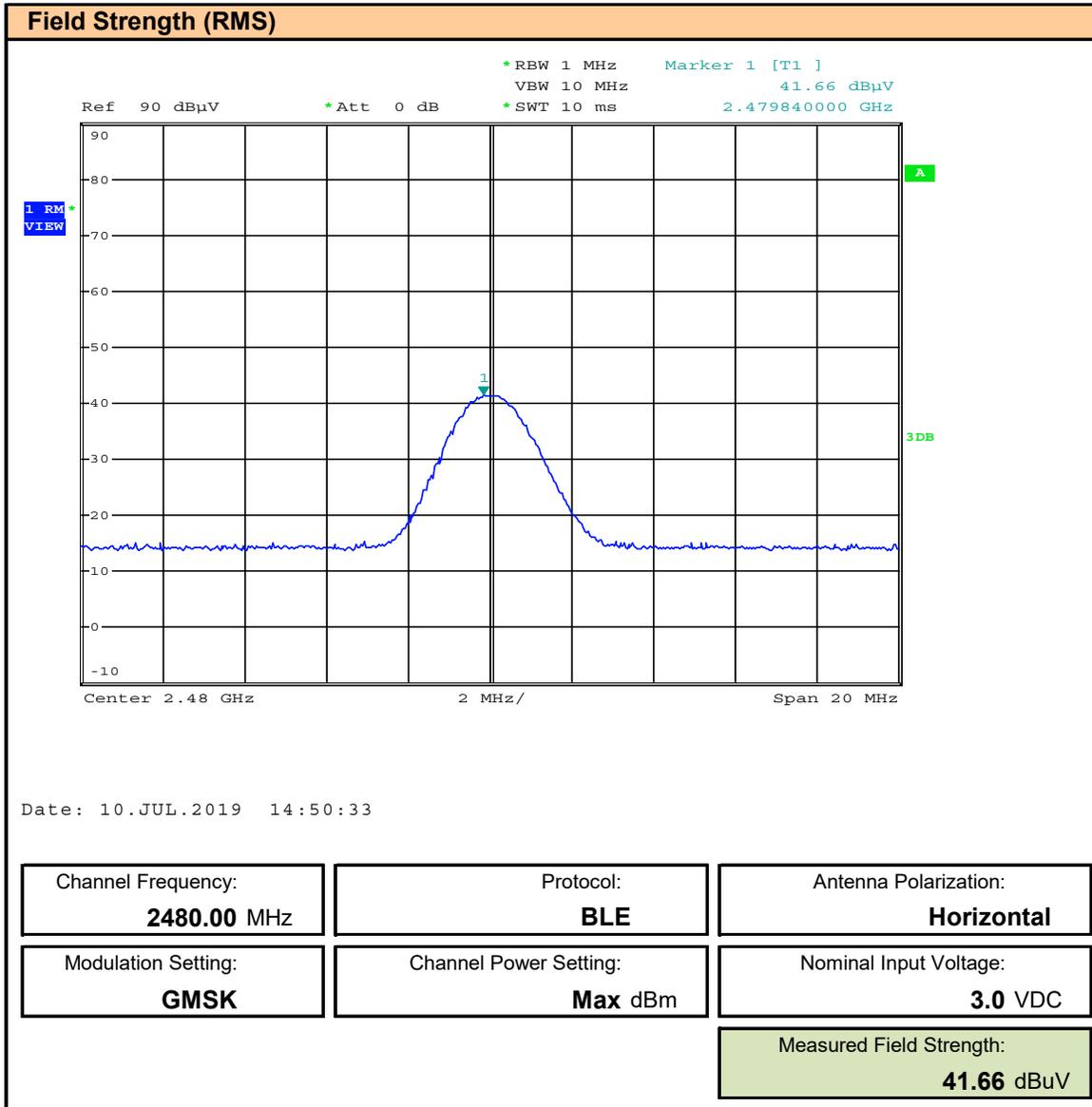
Plot 10.20 – Field Strength, BLE, 2444MHz, Vertical, RMS



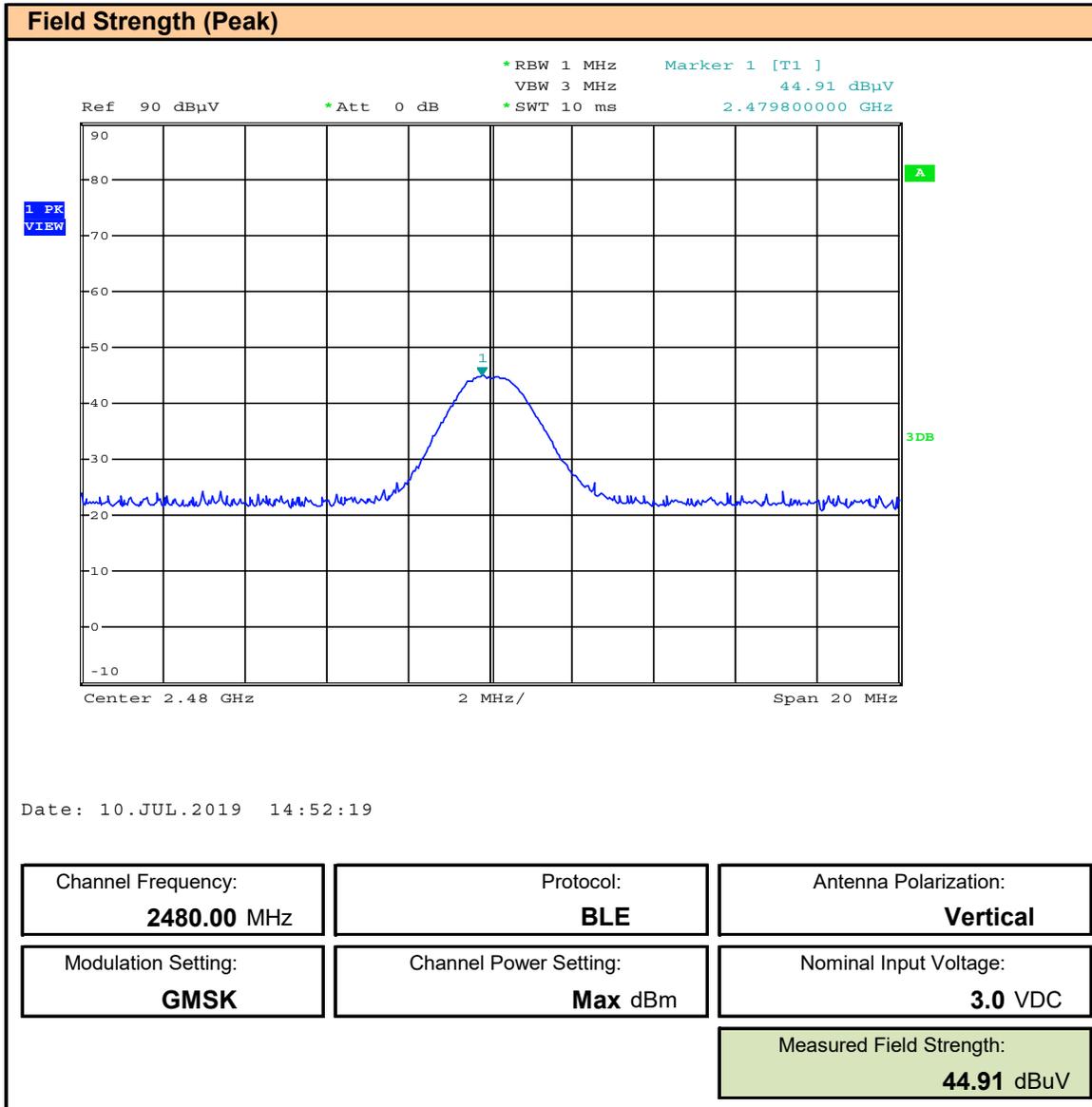
Plot 10.21 – Field Strength, BLE, 2480MHz, Horizontal, Peak



Plot 10.22 – Field Strength, BLE, 2480MHz, Horizontal, RMS



Plot 10.23 – Field Strength, BLE, 2480MHz, Vertical, Peak



Plot 10.24 – Field Strength, BLE, 2480MHz, Vertical, RMS

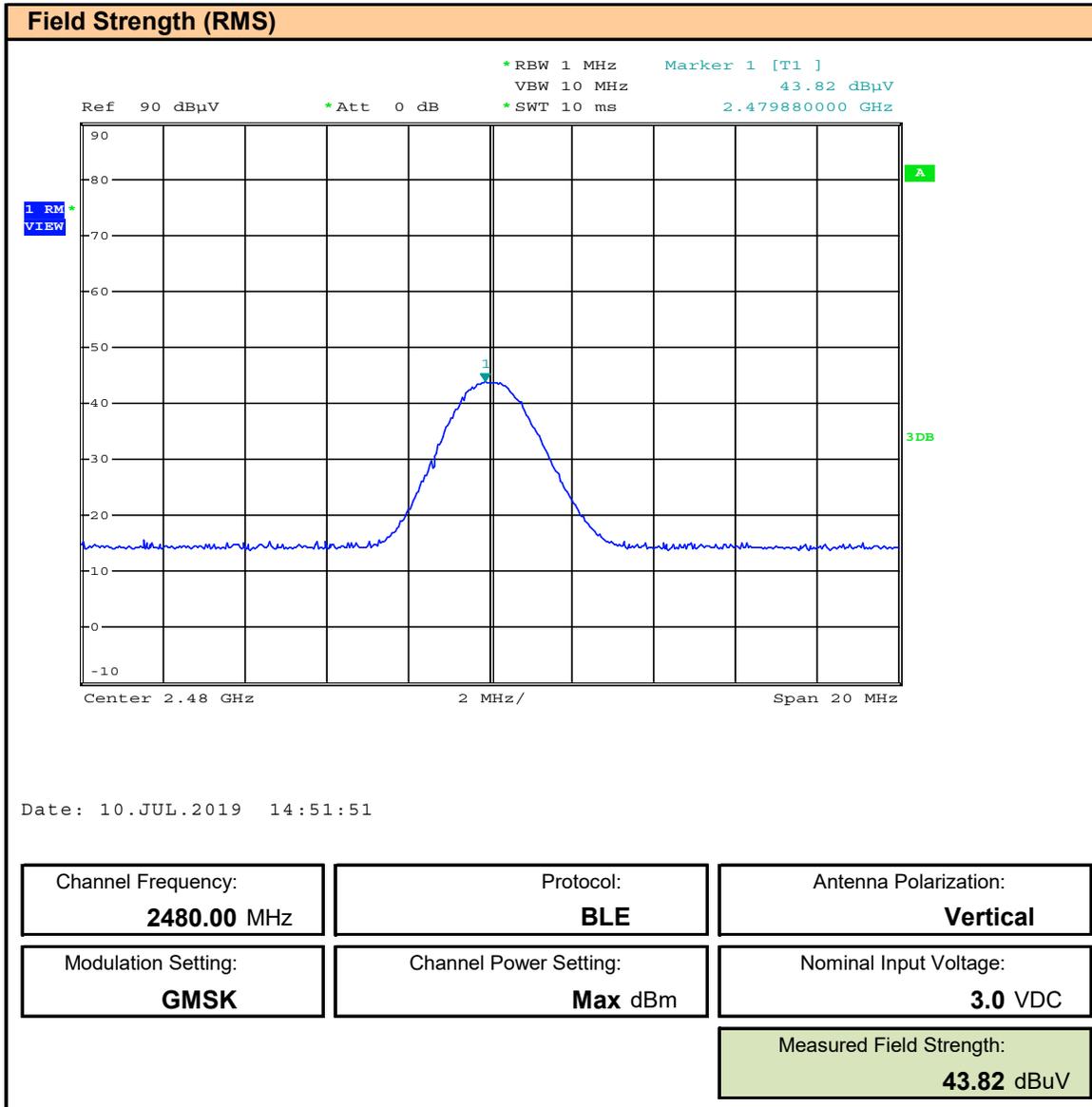


Table 10.1 - Summary of Field Strength Measurements, ANT

FCC §15.249(a), RSS-210 Radiated Field Strength																			
Frequency (MHz)	Mode	OBW (kHz)	Modulation	Power Setting ⁽¹⁾ (dBm)	Supply Voltage (VDC)	Detector	Antenna Polarization	Measured Field Strength [FS _{Meas}] (dBuV @ 3m)	Cable Loss [L _c] (dBm)	Receive Antenna [ACF] (dB)	Corrected Field Strength [FS _{Corr}] (dBuV @3m)	Limit (dBuV)	Margin (dB)						
2402.0	ANT	920	GFSK	Max	3.0	Peak	Horizontal	48.57	4.6	28.3	81.47	114.0	32.5						
2444.0								45.33			78.23		35.8						
2480.0								37.22			70.12		43.9						
2402.0								46.78			79.68		34.3						
2444.0							48.19	81.09			32.9								
2480.0							48.87	81.77			32.2								
2402.0							RMS	Horizontal			48.65		81.55	12.5					
2444.0											43.61		76.51	17.5					
2480.0						35.18					68.08	25.9							
2402.0						Vertical		46.25			79.15	14.9							
2444.0								47.07			79.97	14.0							
2480.0								48.10			81.00	13.0							
Result:											Complies								

$FS_{Corr} = FS_{Meas} + ACF + L_c$

$Margin = Limit - FS_{Corr}$

(1) The output power is factory set to maximum

Table 10.2 - Summary of Field Strength Measurements, BLE

FCC §15.249(a), RSS-210 Radiated Field Strength																			
Frequency (MHz)	Mode	OBW (kHz)	Modulation	Power Setting ⁽¹⁾ (dBm)	Supply Voltage (VDC)	Detector	Antenna Polarization	Measured Field Strength [FS _{Meas}] (dBuV @ 3m)	Cable Loss [L _c] (dBm)	Receive Antenna [ACF] (dB)	Corrected Field Strength [FS _{Corr}] (dBuV @3m)	Limit (dBuV)	Margin (dB)						
2402.0	BLE	1000	GMSK	Max	3.0	Peak	Horizontal	50.02	4.6	28.3	82.92	114.0	31.1						
2444.0								46.67			79.57		34.4						
2480.0								42.17			75.07		38.9						
2402.0								52.38			85.28		28.7						
2444.0							49.46	82.36			31.6								
2480.0							44.91	77.81			36.2								
2402.0							RMS	Horizontal			49.34		82.24	11.8					
2444.0											46.19		79.09	14.9					
2480.0						41.66					74.56	19.4							
2402.0						Vertical		52.08			84.98	9.0							
2444.0								48.83			81.73	12.3							
2480.0								43.82			76.72	17.3							
Result:											Complies								

$FS_{Corr} = FS_{Meas} + ACF + L_c$

$Margin = Limit - FS_{Corr}$

(1) The output power is factory set to maximum

11.0 BAND EDGE

Test Procedure

Normative Reference	FCC 47 CFR §2.1051, §15.249(d)(e), RSS-Gen (6.12), RSS-210 (B.10)
	ANSI C63.10 (6.10.3)

Limits

C63.10 (6.3.10)	<p>6.10.3 Unlicensed wireless device operational configuration</p> <p>Set the EUT to operate at 100% duty cycle or equivalent “normal mode of operation.”⁵⁴ Testing shall be performed at the lowest frequency channel and highest frequency channel within the allowed operating band.⁵⁵ Testing shall be performed for each frequency with every applicable unlicensed wireless device configuration. If more than one power output level is available, then testing shall be done with the appropriate maximum power output for each antenna combination or modulation, as recorded in the unlicensed wireless device conducted power measurement results. The highest gain of each antenna type shall be used for this test.</p>
-----------------	---

⁵⁴ For unlicensed wireless devices unable to be configured for 100% duty cycle even in test mode, configure the system for the longest duration duty cycle supported.

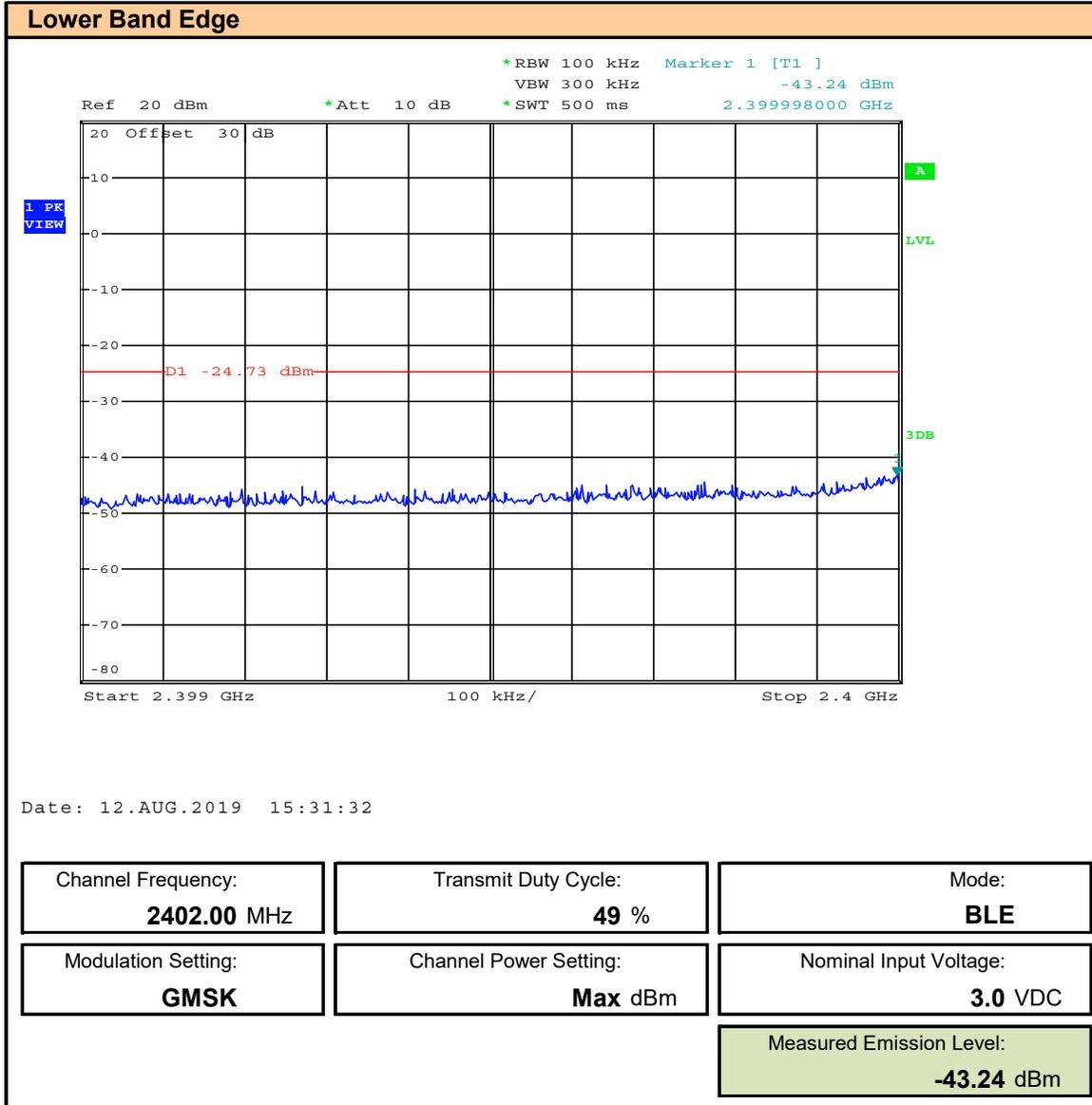
⁵⁵ Some radios operating, for example, in the 2.4 GHz band, have hardware capability to operate at frequencies outside the band permitted by the regulatory authority. Testing shall only be done at the lowest and highest frequencies within the allowed frequency band (see Annex A for examples of regulatory requirements and frequency ranges).

Test Setup	Appendix A	Figure A.1
------------	------------	------------

Measurement Procedure

The DUT was connected to a Spectrum Analyzer (SA) via a 30dB attenuator connected to the DUT's antenna port. The SA was configured as described above. The output power of the DUT was set to the manufacturer's highest output power setting at the Low and High frequency channels as permitted by the device. The unwanted band edge emissions were measured and recorded.

Plot 11.3 – 2402MHz, BLE, Lower Band Edge



Plot 11.4 – 2480MHz, BLE, Upper Band Edge

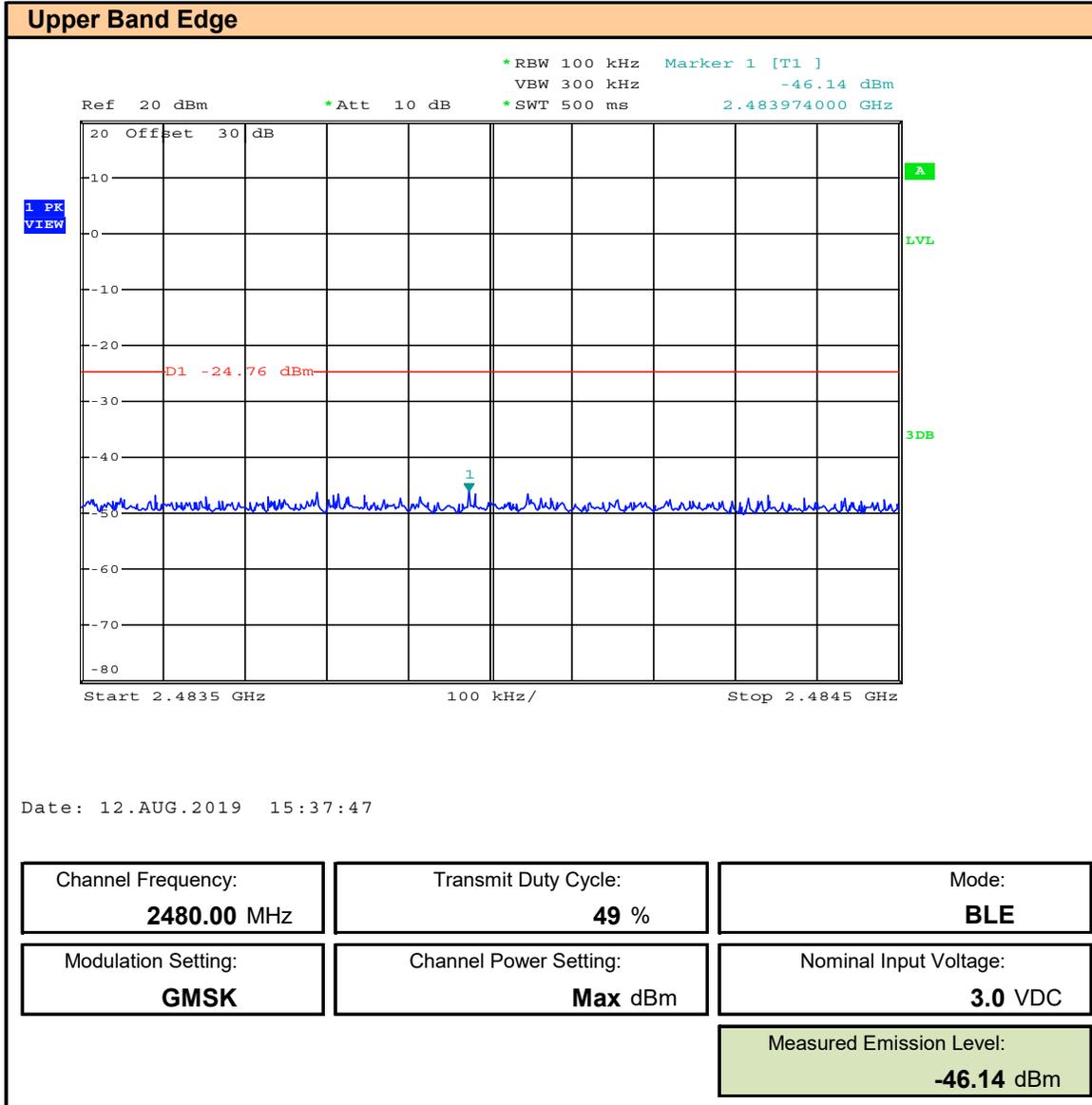


Table 11.1 – Summary of Band Edge Measurements

Band Edge Emission Measurement								
Frequency Range (MHz)	Mode	Modulation	Power Setting ⁽¹⁾ (dBm)	Supply Voltage (VDC)	Transmit Duty Cycle (%)	Measured Emission [E_{Meas}] (dBm)	Limit Line [A_L] (dBm)	Margin (dB)
2399- 2400	ANT	GFSK	Max	3.0	94	-43.58	-24.76	18.82
2483.5 - 2485.5						-46.19		21.43
2399- 2400	BLE	GMSK			49	-43.24	-24.76	18.48
2483.5 - 2485.5						-46.14		21.38
Result:							Complies	

(1) The output power is factory set to maximum

$$\text{Margin} = A_L - E_{\text{MEAS}}$$

12.0 RADIATED SPURIOUS EMISSIONS – RESTRICTED BANDS

Test Procedure

Normative Reference	FCC 47 CFR §2.1046
	KDB 558074 (8.3.2), ANSI C63.10 (11.9.2.2.6)

General Procedure

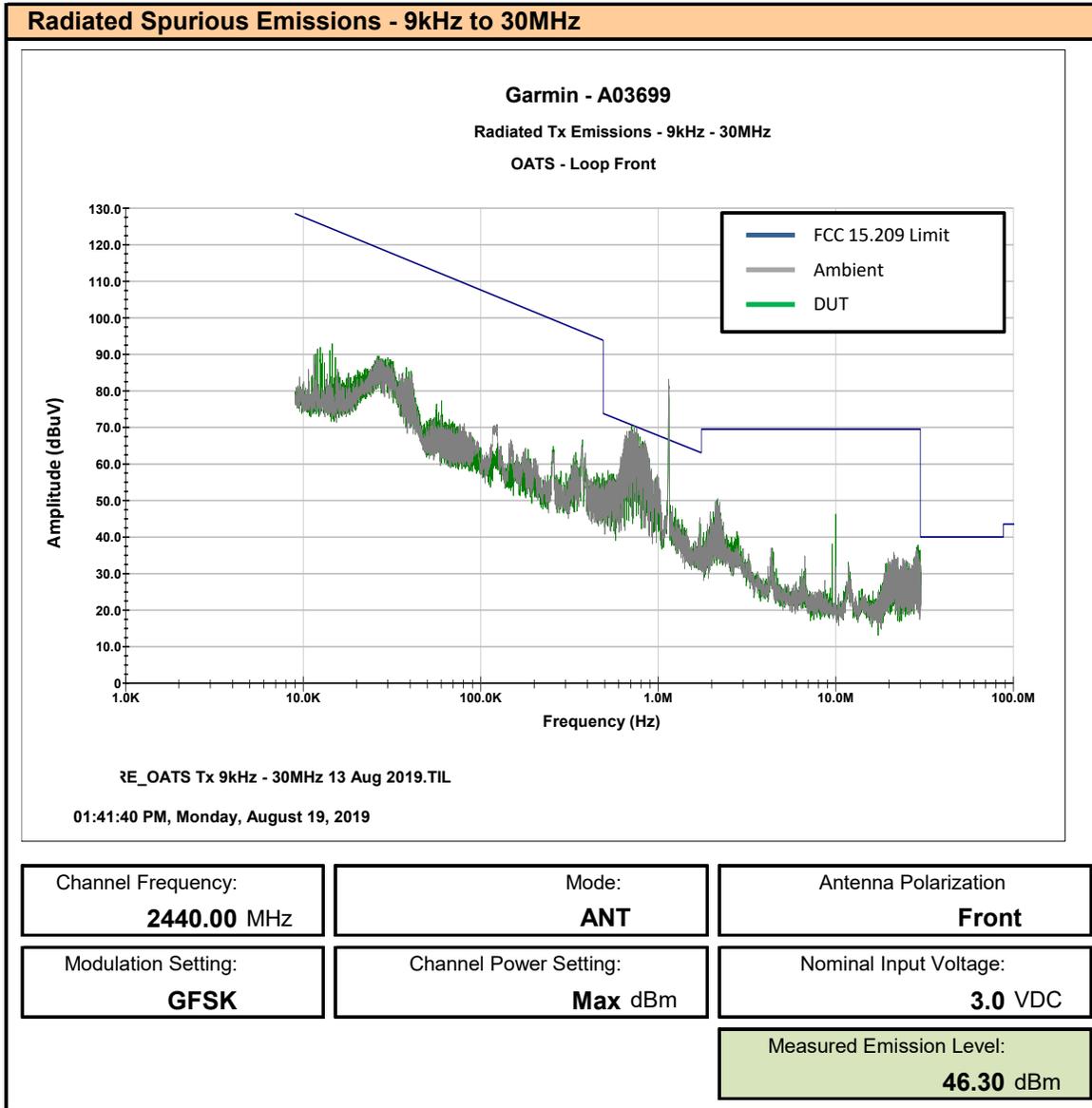
C63.10 (6.5.4)	<p>6.5.4 Final radiated emission tests</p> <p>Using the orientation and equipment arrangement of the EUT, and based on the measurement results found during the exploratory measurement in 6.5.3, the EUT arrangement, appropriate modulation, and modes of operation that produce the emissions that have the highest amplitude relative to the limit shall be selected for the final measurement. The final measurement shall follow all the procedures in 6.3 with the EUT operating on frequencies per 5.6. For each mode selected, record the frequency and amplitude of the highest fundamental emission (if applicable) and the frequency and amplitude of the six highest spurious emissions relative to the limit; emissions more than 20 dB below the limit do not need to be reported.</p> <p>Measurements are performed with the EUT rotated from 0° to 360°, the antenna height scanned between 1 m and 4 m, and the antenna rotated to repeat the measurements for both the horizontal and vertical antenna polarizations. Variations in cable or wire placement shall be explored to maximize the measured emissions.</p>
----------------	---

Test Setup	Appendix A	Figure A.2
-------------------	-------------------	-------------------

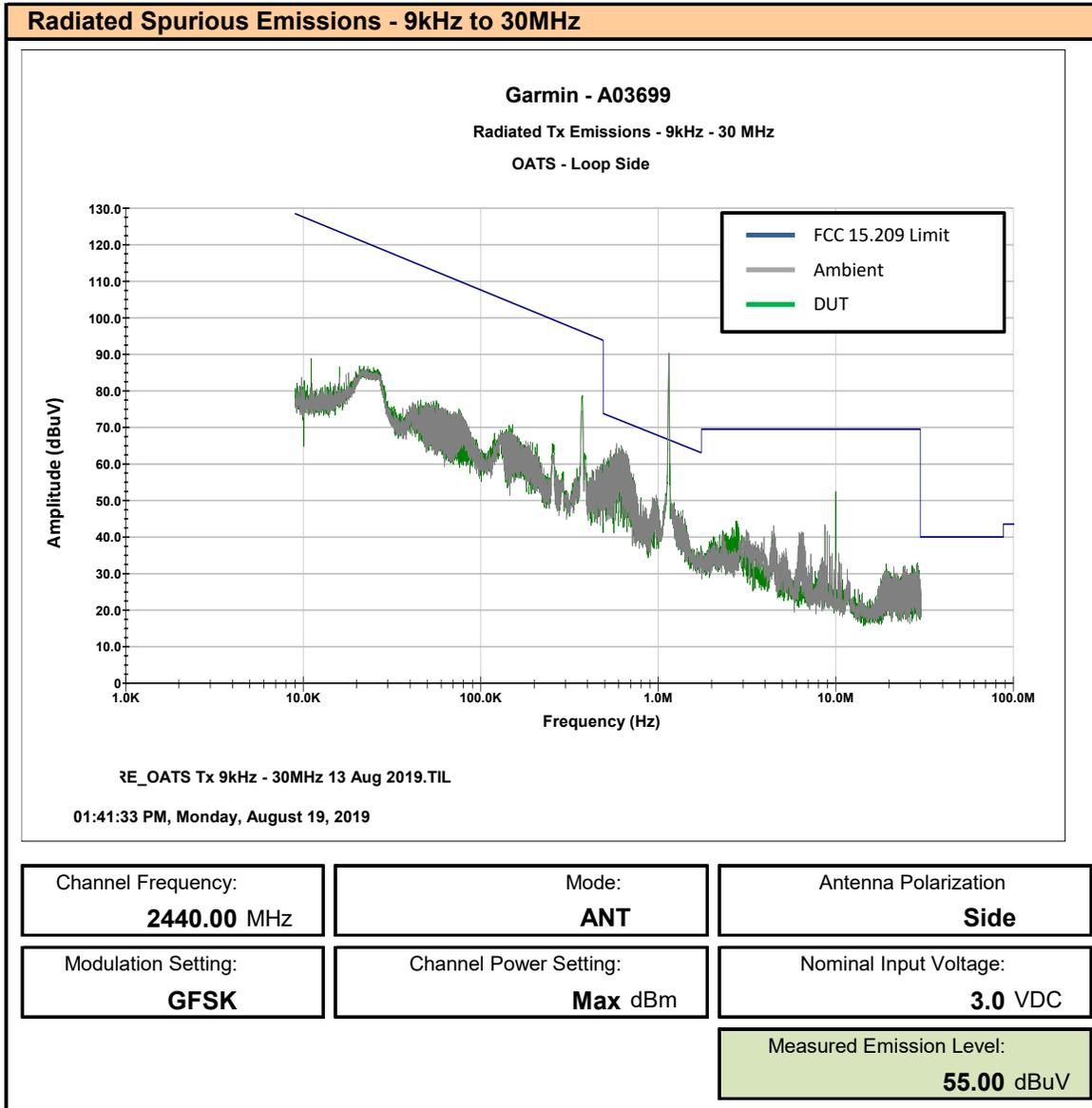
Measurement Procedure

The DUT place on a 80cm high turntable on an Open Area Test Site (OATS) at a distance of 3m from the measurement antenna. The DUT was set to transmit at maximum power and duty cycle. The DUT was rotated 360 degrees and scanned with the receive antenna elevated from 1 to 4m. The emissions were measured to the 10th harmonic and recorded.

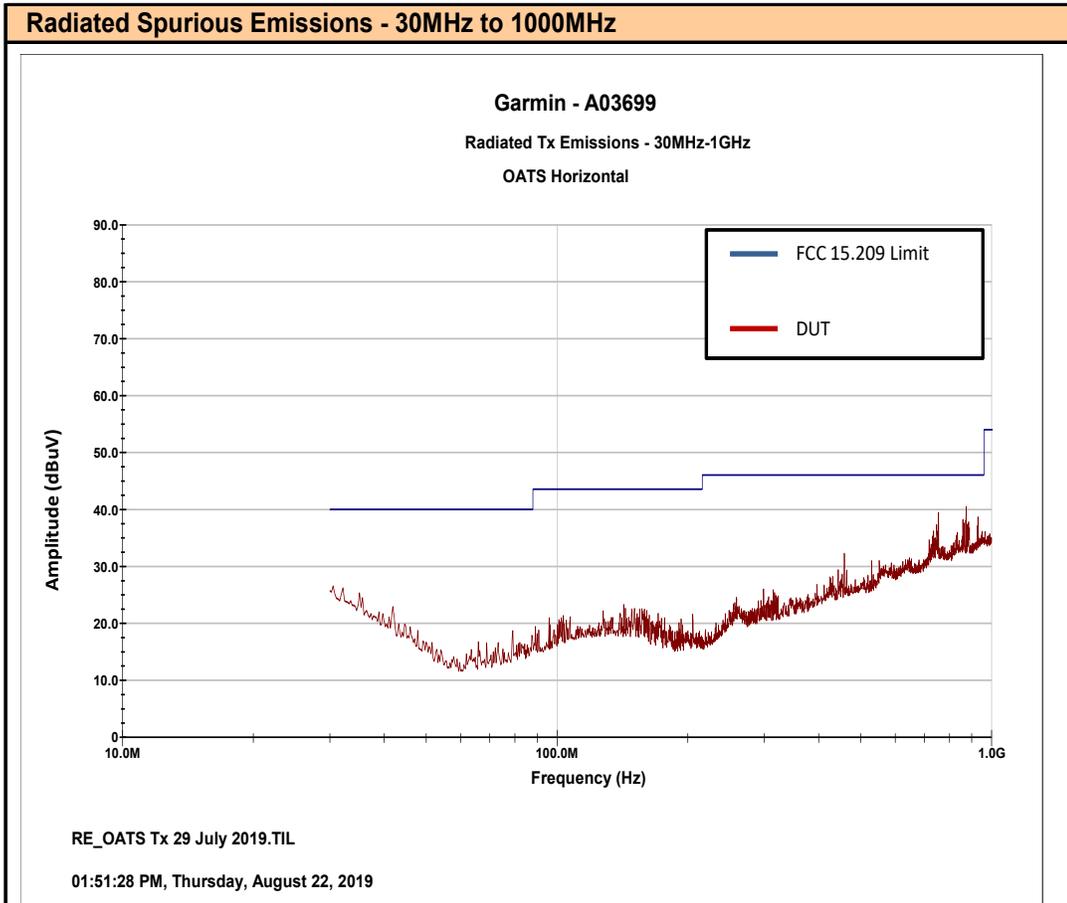
Plot 12.1 – Spurious Emissions - 9kHz – 30MHz, Front Polarization



Plot 12.2 – Spurious Emissions - 9kHz – 30MHz, Side Polarization

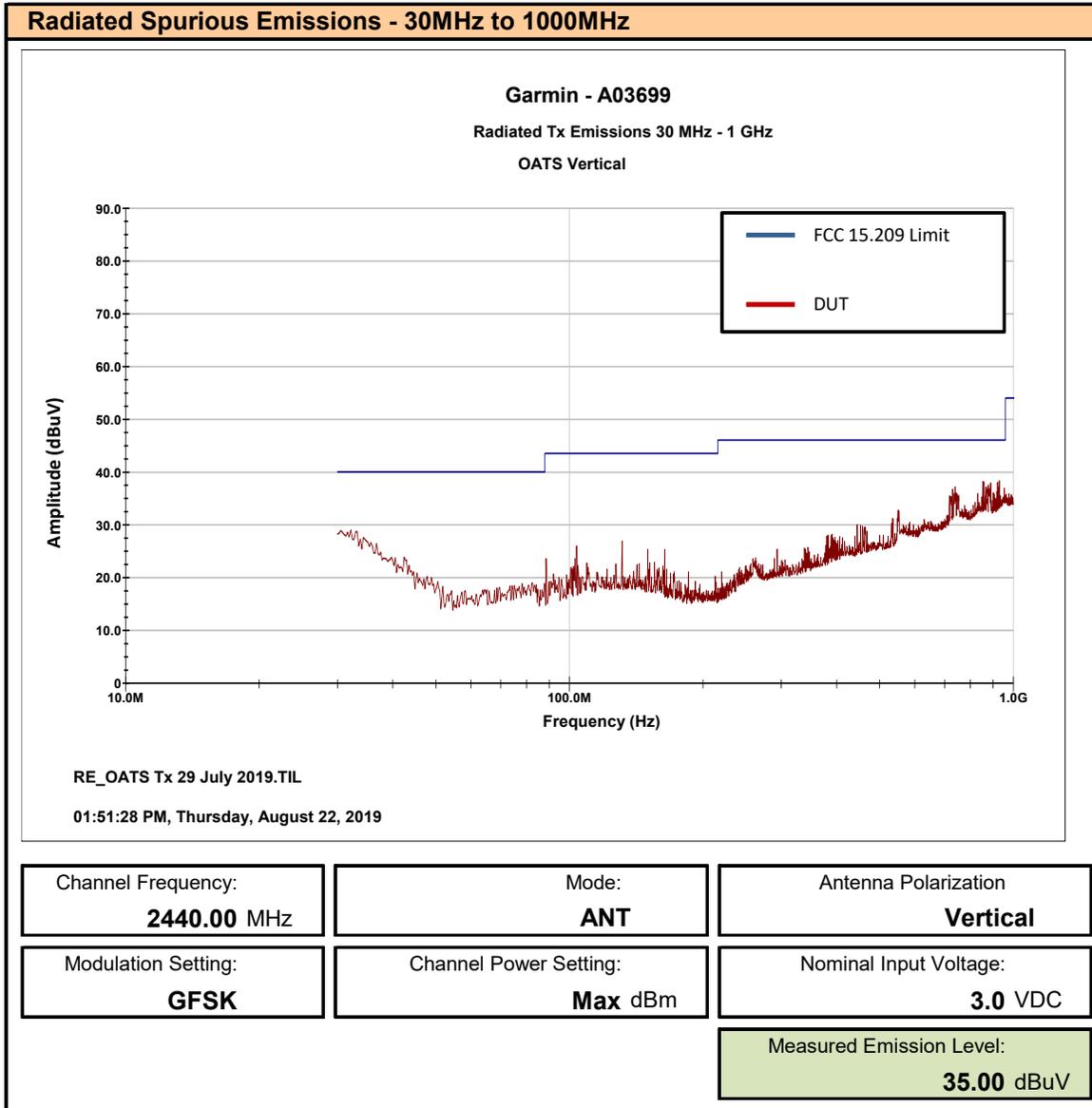


Plot 12.3 – Spurious Emissions - 30MHz – 1000MHz, Horizontal

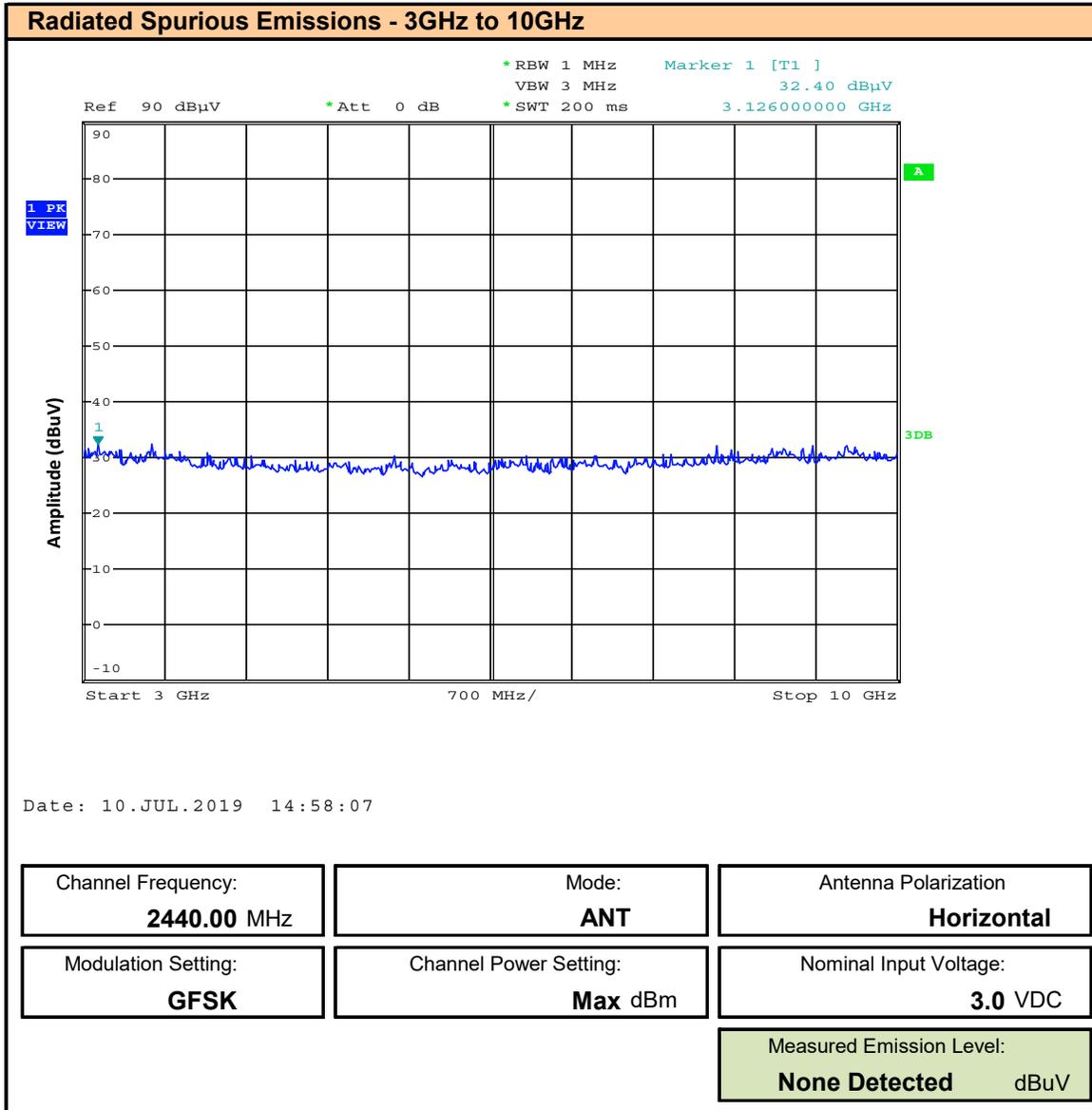


Channel Frequency: 2440.00 MHz	Mode: ANT	Antenna Polarization Horizontal
Modulation Setting: GFSK	Channel Power Setting: Max dBm	Nominal Input Voltage: 3.0 VDC
		Measured Emission Level: 41.00 dBuV

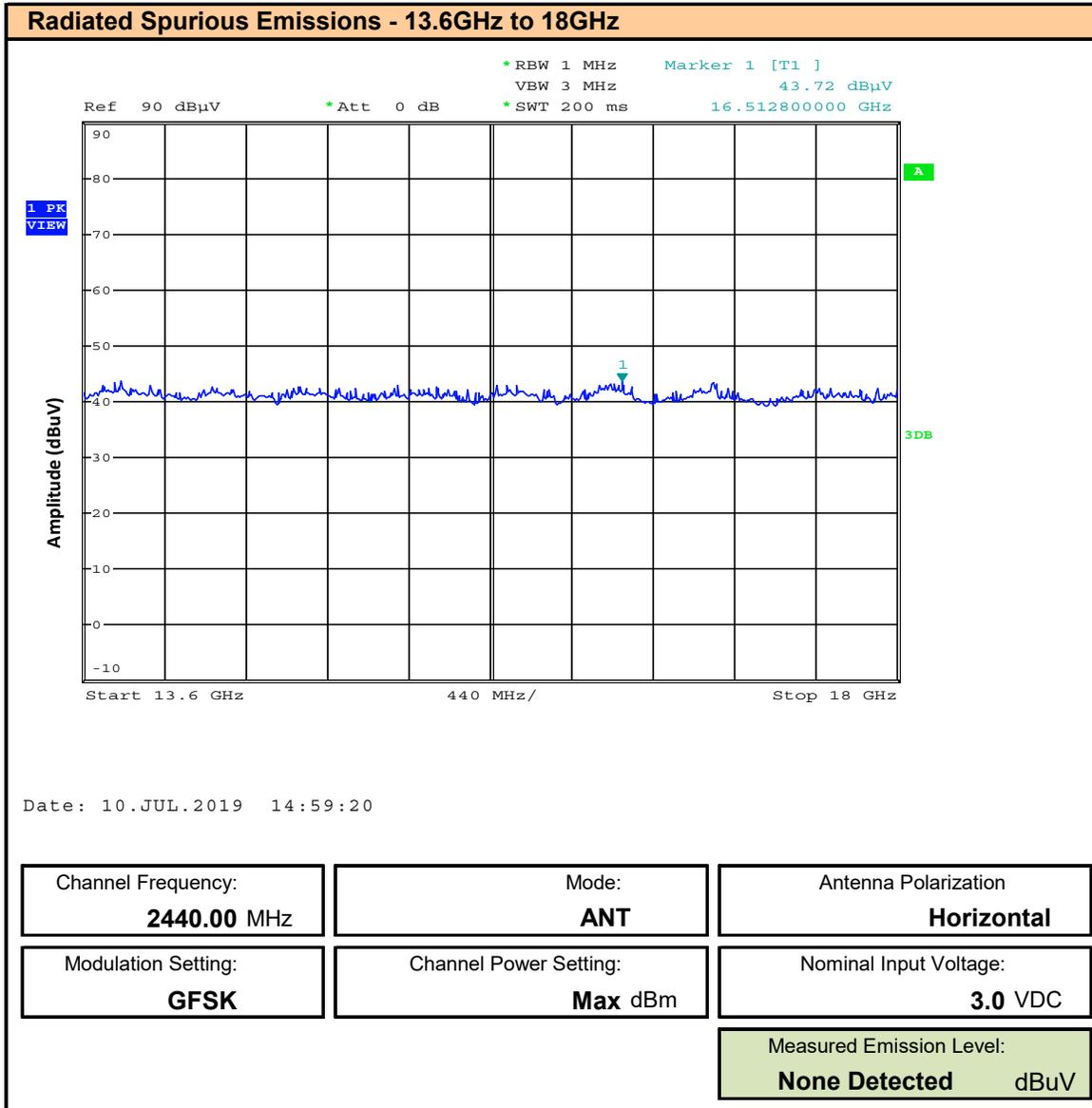
Plot 12.4 – Spurious Emissions - 30MHz – 1000MHz, Vertical



Plot 12.5 – Spurious Emissions - 3GHz – 10GHz, Horizontal



Plot 12.9 – Spurious Emissions - 13.6GHz – 18GHz, Horizontal



Plot 12.10 – Spurious Emissions - 13.6GHz – 18GHz, Vertical

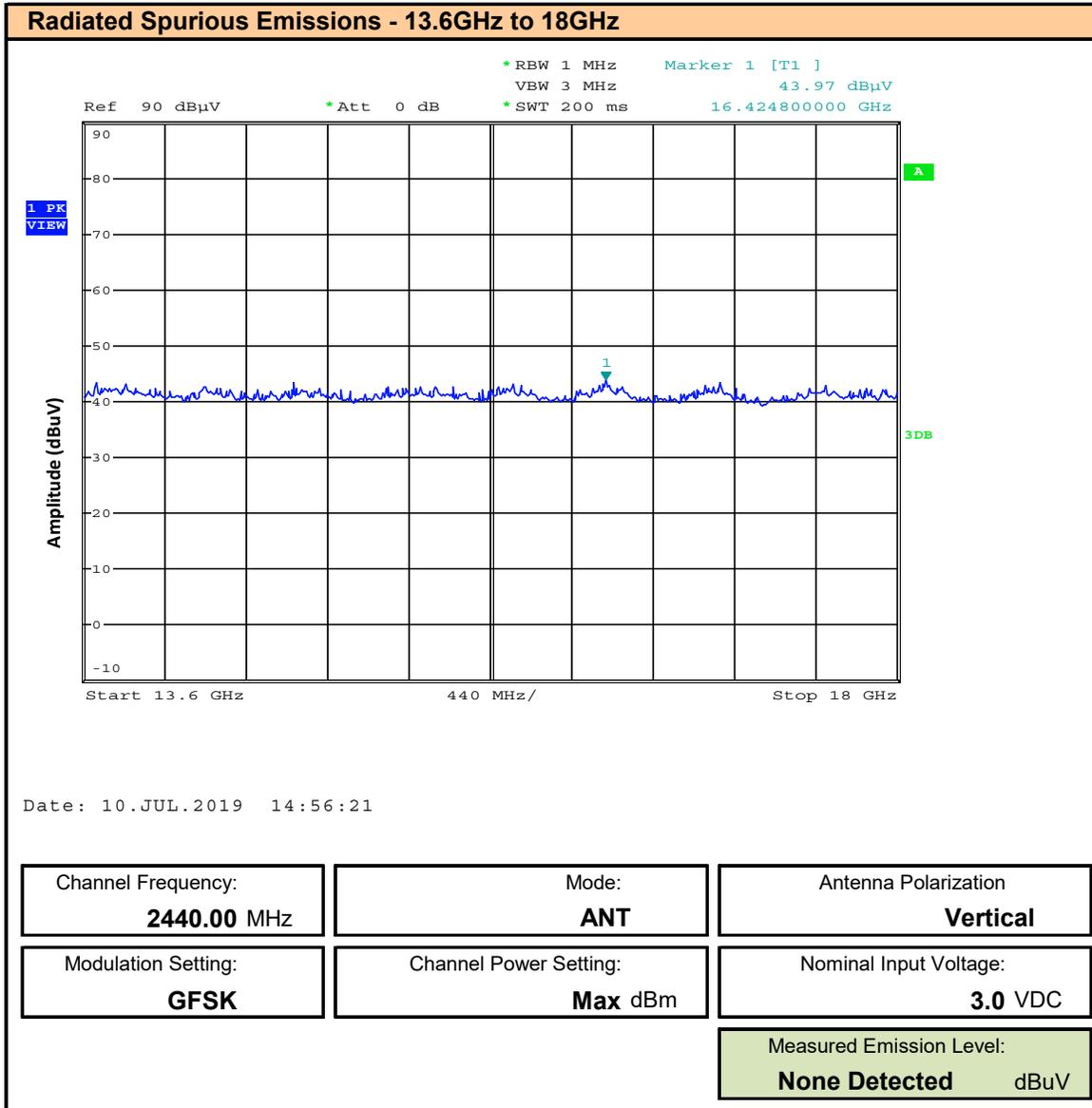


Table 12.1 – Summary of Radiated Emissions – Restricted Band

Emission Level Measurement					
Frequency Range	Emission Frequency	Antenna Polarization	Measured Emission⁽¹⁾ [E_{Meas}] (dBuV)	Limit Line [A_L] (dBm)	Margin (dB)
9kHz - 30MHz	9.992MHz	Front	46.3	69.5	23.2
9kHz - 30MHz	9.992MHz	Side	52.4	69.6	17.2
30MHz - 1GHz	874	Horizontal	40.5	46.0	5.5
30MHz - 1GHz	930	Vertical	38.4	46.0	7.6
Result:				Complies	

(1) Antenna Correction Factors (ACF) and cable loss corrected.

$$\text{Margin} = A_L - E_{\text{MEAS}}$$

No other spurious emissions within 20dB of the limit or above the ambient emissions were detected

APPENDIX A – TEST SETUP DRAWINGS AND EQUIPMENT

Table A.1 – Setup - Conducted Measurements Equipment

Equipment List			
Asset Number	Manufacturer	Model Number	Description
00241	R&S	FSU40	Spectrum Analyzer

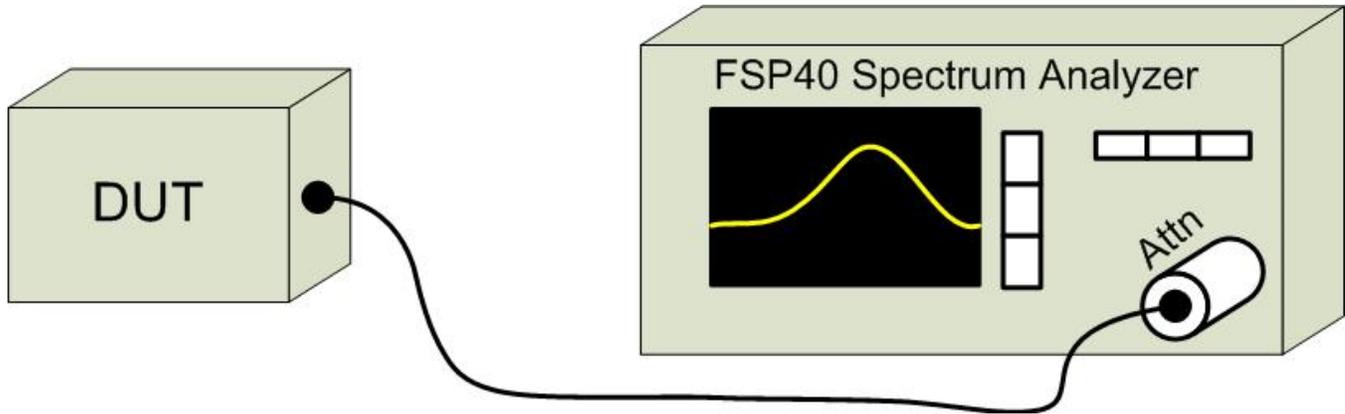


Figure A.1 – Test Setup Conducted Measurements

Table A.2 – Setup - Radiated Emissions Equipment

Equipment List			
Asset Number	Manufacturer	Model Number	Description
00051	HP	8566B	Spectrum Analyzer
00049	HP	85650A	Quasi-peak Adapter
00047	HP	85685A	RF Preselector
00072	EMCO	2075	Mini-mast
00073	EMCO	2080	Turn Table
00071	EMCO	2090	Multi-Device Controller
00265	Miteq	JS32-00104000-58-5P	Microwave L/N Amplifier
00241	R&S	FSU40	Spectrum Analyzer
00050	Chase	CBL-6111A	Bilog Antenna
00275	Coaxis	LMR400	25m Cable
00276	Coaxis	LMR400	4m Cable
00278	TILE	34G3	TILE Test Software
00034	ETS	3115	Double Ridged Guide Horn
00085	EMCO	6502	Loop Antenna
00161	Waveline Inc.	889	Standard Gain Horn 18-26GHz
00162	Waveline Inc.	889	Standard Gain Horn 18-26GHz
00163	Waveline Inc.	1099	Standard Gain Horn 26-40GHz
00164	Waveline Inc.	1099	Standard Gain Horn 26-40GHz
00165	Waveline Inc.	801-KF	Waveguide Adapter 18-26GHz
00166	Waveline Inc.	801-KF	Waveguide Adapter 18-26GHz
00167	Waveline Inc.	1001-KF	Waveguide Adapter 26-40GHz
00168	Waveline Inc.	1001-KF	Waveguide Adapter 26-40GHz

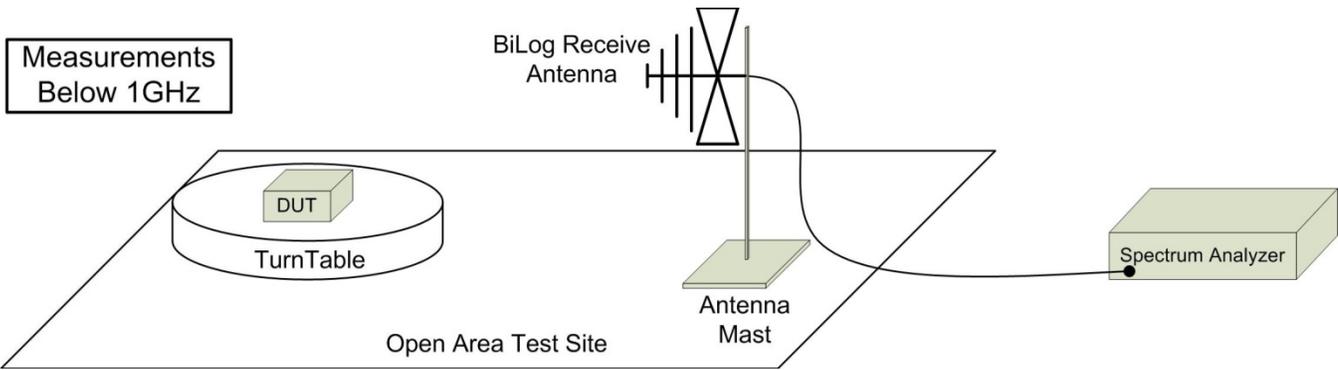


Figure A.2 – Test Setup Radiated Emissions Measurements 30-1000MHz

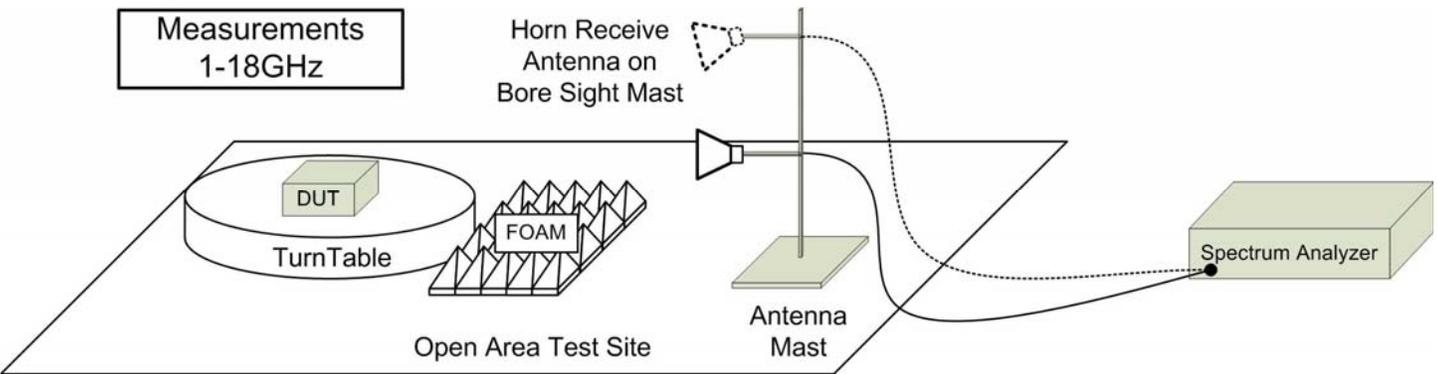


Figure A.3 – Test Setup Radiated Emissions Measurements 1-18GHz

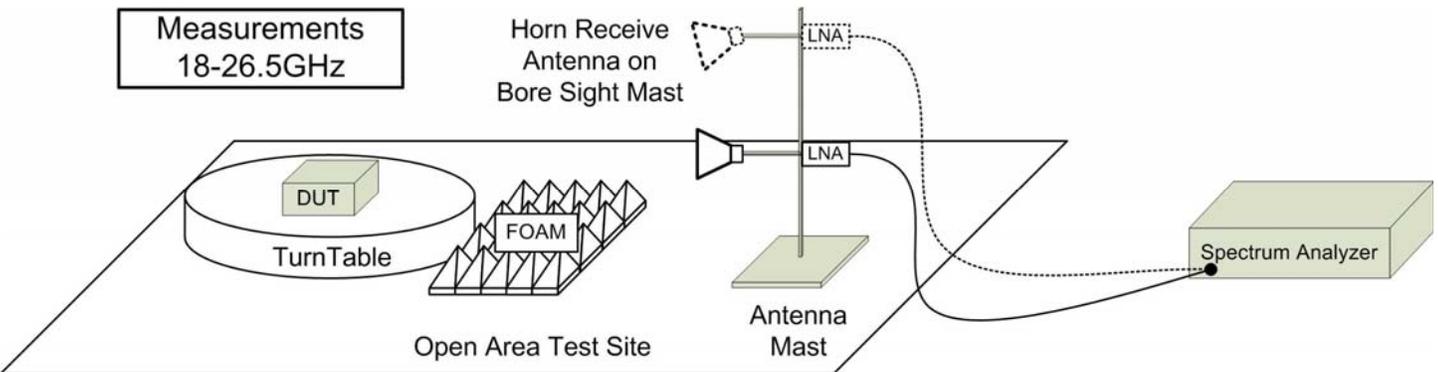


Figure A.4 – Test Setup Radiated Emissions Measurements 18-26.5GHz

APPENDIX B – EQUIPMENT LIST AND CALIBRATION

Equipment List								
(*)	Asset Number	Manufacturer	Model Number	Serial Number	Description	Last Calibrated	Calibration Interval	Calibration Due
*	00050	Chase	CBL-6111A	1607	Bilog Antenna	3 Jan 2019	Triennial	3 Jan 2022
*	00034	ETS	3115	6267	Double Ridged Guide Horn	26 Nov 2018	Triennial	26 Nov 2021
	00035	ETS	3115	6276	Double Ridged Guide Horn	22 Mar 2019	Triennial	21 Mar 2022
*	00085	EMCO	6502	9203-2724	Loop Antenna	11 Jun 2019	Triennial	11 Jun 2022
*	00161	Waveline Inc.	889		Standard Gain Horn 18-26GHz	NCR	n/a	NCR
	00162	Waveline Inc.	889		Standard Gain Horn 18-26GHz	NCR	n/a	NCR
	00163	Waveline Inc.	1099		Standard Gain Horn 26-40GHz	NCR	n/a	NCR
	00164	Waveline Inc.	1099		Standard Gain Horn 26-40GHz	NCR	n/a	NCR
*	00165	Waveline Inc.	801-KF		Waveguide Adapter 18-26GHz	NCR	n/a	NCR
	00166	Waveline Inc.	801-KF		Waveguide Adapter 18-26GHz	NCR	n/a	NCR
	00167	Waveline Inc.	1001-KF		Waveguide Adapter 26-40GHz	NCR	n/a	NCR
	00168	Waveline Inc.	1001-KF		Waveguide Adapter 26-40GHz	NCR	n/a	NCR
*	00047	HP	85685A	2837A00826	RF Preselector	23 Jun 2017	Triennial	23 Jun 2020
*	00049	HP	85650A	2043A00162	Quasi-peak Adapter	23 Jun 2017	Triennial	23 Jun 2020
*	00051	HP	8566B	2747A05510	Spectrum Analyzer	23 Jun 2017	Triennial	23 Jun 2020
	00223	HP	8901A	3749A07154	Modulation Analyzer	27 Dec 2017	Triennial	27 Dec 2020
	00224	HP	8903B	3729A18691	Audio Analyzer	28 Dec 2017	Triennial	28 Dec 2020
*	00241	R&S	FSU40	100500	Spectrum Analyzer	15 May 2018	Triennial	15 May 2021
*	00005	HP	8648D	3847A00611	Signal Generator	21 Jun 2017	Triennial	21 Jun 2020
	00006	R&S	SMR20	100104	Signal Generator	29 May 2017	Triennial	29 May 2020
	00243	Rigol	DS1102E	DS1ET150502164	Oscilloscope	7 Nov 2017	Triennial	7 Nov 2020
	00254	LeCroy	WM8600A	532	Oscilloscope	NCR	n/a	NCR
	00110	Gigatronics	8652A	1875801	Power Meter	26 Mar 2019	Triennial	26 Mar 2022
	00237	Gigatronics	80334A	1837001	Power Sensor	26 Mar 2019	Triennial	26 Mar 2022
	00232	ETS Lindgren	HI-6005	91440	Isotropic E-Field Probe	18 Dec 2017	Triennial	18 Dec 2020
	00003	HP	53181A	3736A05175	Frequency Counter	21 Jun 2017	Triennial	21 Jun 2020
	00257	Com-Power	LI-215A	191934	LISN	5 Jan 2018	Triennial	5 Jan 2021
	00041	AR	10W1000C	27887	Power Amplifier	NCR	n/a	NCR
	00106	AR	5SIG4	26235	Power Amplifier	NCR	n/a	NCR
	00280	AR	25A250AM6	22702	Power Amplifier	NCR	n/a	NCR
*	00265	Miteq	JS32-00104000-58-5P	1939850	Microwave L/N Amplifier	COU	n/a	COU
	00071	EMCO	2090	9912-1484	Multi-Device Controller	n/a	n/a	n/a
*	00072	EMCO	2075	0001-2277	Mini-mast	n/a	n/a	n/a
*	00073	EMCO	2080	0002-1002	Turn Table	n/a	n/a	n/a
	00081	ESPEC	ECT-2	0510154-B	Environmental Chamber	NCR	n/a	CNR
*	00234	VWR	61161-378	140320430	Temp/Humidity Meter	New	Triennial	New
	00236	Nokia	-	236	ESD Table	NCR	n/a	NCR
	00255	Expert ESD	A4001	A4001-155	ESD Target	COU	n/a	COU
	00064	NARDA	3020A	n/a	Bi-Directional Coupler	COU	n/a	COU
	00263	Koaxis	KP10-1.00M-TD	263	1m Armoured Cable	COU	n/a	COU
*	00263B	Koaxis	KP10-1.00M-TD	263B	1m Armoured Cable	COU	n/a	COU
*	00264	Koaxis	KP10-7.00M-TD	264	7m Armoured Cable	COU	n/a	COU
*	00275	TMS	LMR400	n/a	25m Cable	COU	n/a	COU
*	00276	TMS	LMR400	n/a	4m Cable	COU	n/a	COU
*	00277	TMS	LMR400	n/a	4m Cable	COU	n/a	COU
*	00278	TILE	34G3	n/a	TILE Test Software	NCR	n/a	NCR
Rented Equipment								

* Used during the course of this investigation
 NCR: No Calibration Required
 COU: Calibrate On Use

APPENDIX C – MEASUREMENT INSTRUMENT UNCERTAINTY

CISPR 16-4 Measurement Uncertainty (U_{LAB})	
This uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence interval using a coverage factor of k=2	
30MHz - 200MHz	
$U_{LAB} = 5.14dB$ $U_{CISPR} = 6.3dB$	
200MHz - 1000MHz	
$U_{LAB} = 5.90dB$ $U_{CISPR} = 6.3dB$	
1GHz - 6GHz	
$U_{LAB} = 4.80dB$ $U_{CISPR} = 5.2dB$	
6GHz - 18GHz	
$U_{LAB} = 5.1dB$ $U_{CISPR} = 5.5dB$	
If the calculated uncertainty U_{lab} is less than U_{CISPR} then:	
1	Compliance is deemed to occur if NO measured disturbance exceeds the disturbance limit
2	Non-Compliance is deemed to occur if ANY measured disturbance EXCEEDS the disturbance limit
If the calculated uncertainty U_{lab} is greater than U_{CISPR} then:	
3	Compliance is deemed to occur if NO measured disturbance, increased by ($U_{lab} - U_{CISPR}$), exceeds the disturbance limit
4	Non-Compliance is deemed to occur if ANY measured disturbance, increased by ($U_{lab} - U_{CISPR}$), EXCEEDS the disturbance limit



21-364 Lougheed Road, Kelowna, British Columbia, Canada V1X 7R8
Tel: 1-250-765-7650 Fax: 1-250-765-7645

Date: 22 May 2020

To:
Federal Communications Commission
7435 Oakland Mills Road
Columbia, Maryland 21046
USA

RE: SAR Test Exclusion for FCC ID: IPH-03699

The Garmin International Inc. Model A03699, FCC ID: **IPH-03699** is a Body Worn low power ANT/BLE transceiver. It has a manufacturers maximum rated output power of 8dBm and was verified by means of conducted output power measurement at the antenna port. The highest measured conducted output power for ANT and BLE was 7.81dBm and 6.79dBm respectively. The highest measured field strength at 3m was 48.84dBuV and 52.38dBuV respectively. This equates to an EIRP of approximately -17dBm and -14dBm respectively. The manufacturer's maximum rated transmit duty cycle (Reference Exhibit x – Operation Description) is 13.3% and 26.5% respectively. The measured duty cycle was 0.067% and 0.17% respectively. Using the rated output power of 8dBm (6.3mW) and the maximum rated transmit duty cycle of 26.5%, the equivalent output power is:

$$6.3\text{mW} \times 0.265 = 1.7\text{mW}$$

Per FCC KDB 447498 D01v06r02 Appendix A, the SAR Test Exclusion Threshold is 10mW therefore this device meets the Standalone SAR Test Exclusion requirement.

Should there be any questions or concerns with this filing, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Art Voss'.

Art Voss, P.Eng.
Technical Manager
250-765-7650 Ext 202
art.voss@celltechlabs.com