



October 19, 2015

Timco
Applications Examiner

RE: Limited Modular Approval for Camero tech FCC ID: 2AACLX400FWM

Dear Application Examiner:

Regarding Part 15 Unlicensed Limited Modular Transmitter Approval, the following requirements called out in FCC Public Notice DA 00-1407 are observed:

1) The modular transmitter must have its own RF shielding. This is intended to ensure that the module does not have to rely upon the shielding provided by the device into which it is installed in order for all modular transmitter emissions to comply with Part 15 limits. It is also intended to prevent coupling between the RF circuitry of the module and any wires or circuits in the device into which the module is installed. Such coupling may result in non-compliant operation.

The Camero tech model Xaver400 Wireless Module is a completely self contained radio however it does not currently have its own RF shielding on the RF section. Therefore this module is being submitted for a Limited Modular Approval. The module will be limited to the host device which it was tested within. The host device will provide the necessary RF shielding to meet the requirements of the applicable standard.

2) The modular transmitter must have buffered modulation/data inputs (if such inputs are provided) to ensure that the module will comply with Part 15 requirements under conditions of excessive data rates or overmodulation.

The Camero tech Xaver400 Wireless Module is a completely self contained radio which modulates its own RF transmitter. It controls the data flow to the transmitter section compliant with Part 15 requirements.

3) The modular transmitter must have its own power supply regulation. This is intended to ensure that the module will comply with Part 15 requirements regardless of the design of the power supplying circuitry in the device into which the module is installed.

The Camero tech Xaver400 Wireless Module is connected to the host device via special connector. The module gets power from the host device (5VDC) and has its own on board regulator to decrease the voltage down to 3.3VDC to power itself.

4) The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c). The antenna must either be permanently attached or employ a "unique" antenna coupler (at all connections between the module and the antenna, including the cable). Any antenna used with the module must be approved with the module, either at the time of initial authorization or through a Class II permissive change. The "professional installation" provision of Section 15.203 may not be applied to modules.

For this application, the Camero tech Xaver400 Wireless Module employs a permanently attached antenna or has a unique antenna connector only.



5) The modular transmitter must be tested in a stand-alone configuration, i.e., the module must not be inside another device during testing. This is intended to demonstrate that the module is capable of complying with Part 15 emission limits regardless of the device into which it is eventually installed. Unless the transmitter module will be battery powered, it must comply with the AC line conducted requirements found in Section 15.207. AC or DC power lines and data input/output lines connected to the module must not contain ferrites, unless they will be marketed with the module (see Section 15.27(a)). The length of these lines shall be length typical of actual use or, if that length is unknown, at least 10 centimeters to insure that there is no coupling between the case of the module and supporting equipment. Any accessories, peripherals, or support equipment connected to the module during testing shall be unmodified or commercially available (see Section 15.31(i)).

This module is being considered for a Limited Modular Approval. The module was tested in the host device in which it will be marketed with and shown to meet the requirements of Part 15 while installed within the marketed host device. The manufacture will ensure that no other host device be used with the module, doing so will require additional testing and certification.

6) The modular transmitter must be labeled with its own FCC ID number, and, if the FCC ID is not visible when the module is installed inside another device, then the outside of the device into which the module is installed must also display a label referring to the enclosed module. This exterior label can use wording such as the following: "Contains Transmitter Module FCC ID: XYZMODEL1" or "Contains FCC ID: XYZMODEL1."

Any similar wording that expresses the same meaning may be used. The Grantee may either provide such a label, an example of which must be included in the application for equipment authorization, or, must provide adequate instructions along with the module which explain this requirement. In the latter case, a copy of these instructions must be included in the application for equipment authorization.

The Camero tech will ensure that the FCC ID for the radio module be visible to the end user after installation. The host device will bear and label that reads "Contains FCC ID: 2AACLX400FWM".

7) The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter and the manufacturer must provide adequate instructions along with the module to explain any such requirements. A copy of these instructions must be included in the application for equipment authorization. For example, there are very strict operational and timing requirements that must be met before a transmitter is authorized for operation under Section 15.231. For instance, data transmission is prohibited, except for operation under Section 15.231(e), in which case there are separate field strength level and timing requirements. Compliance with these requirements must be assured.

The Camero tech model Xaver400 Wireless Module comes equipped with embedded firmware that controls these parameters.



8) The modular transmitter must comply with any applicable RF exposure requirements. For example, FCC Rules in Sections 2.1091, 2.1093 and specific Sections of Part 15, including 15.319(i), 15.407(f), 15.253(f) and 15.255(g), require that Unlicensed PCS, UNII and millimeter wave devices perform routine environmental evaluation for RF Exposure to demonstrate compliance. In addition, spread spectrum transmitters operating under Section 15.247 are required to address RF Exposure compliance in accordance with Section 15.247(b)(4). Modular transmitters approved under other Sections of Part 15, when necessary, may also need to address certain RF Exposure concerns, typically by providing specific installation and operating instructions for users, installers and other interested parties to ensure compliance.

The Camero tech model Xaver400 Wireless Module complies with RF exposure requirements for Mobile Equipment.

Regards,

A handwritten signature in purple ink that reads "Sandi McEnery".

Sandi McEnery
Agent for CAMERO TECH