



## Modular Approval Request Letter

December 4, 2023

FCC ID: 2AAZF-PIEX01, IC: 11508A-PIEX01

Dear Sir or Madam:

*Limited Modular Approval is being requested for RFID module (Model: PIEX01) and the module will be installed only in host systems manufactured by Intuitive Surgical Inc.*

The following paragraphs detail the requirements for modules and explain how the module meets those requirements. Where requirements are not met a justification for a limited modular approval is presented.

FCC §15.212 Requirements for Single Modular Transmitters (includes RSS GEN Section 3.2.2)

(a) Single modular transmitters consist of a completely self-contained radiofrequency transmitter device that is typically incorporated into another product, host or device. Split modular transmitters consist of two components: a radio front end with antenna (or radio devices) and a transmitter control element (or specific hardware on which the software that controls the radio operation resides). All single or split modular transmitters are approved with an antenna. All of the following requirements apply, except as provided in paragraph (b) of this section.

(1) Single modular transmitters must meet the following requirements to obtain a modular transmitter approval.

(i) The radio elements of the modular transmitter must have their own shielding. The physical crystal and tuning capacitors may be located external to the shielded radio elements.

*No. The radio elements of the modular transmitter do not have their own shielding.*

(ii) 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 over-modulation.

*Yes. Data to the modulation circuit is buffered on the module inside component U4 on the schematic (Mfg: STMicroelectronics, Model: CR95HF-VMD5T)*

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(iii) The modular transmitter must have its own power supply regulation.

*Yes. The module contains its own power supply regulation. Please refer to Block diagram.*

(iv) The modular transmitter must comply with the antenna and transmission system requirements of §§15.203, 15.204(b) 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). The “professional installation” provision of §15.203 is not applicable to modules but can apply to limited modular approvals under paragraph (b) of this section.

*Yes. The module permanently connects to its integral loop. The antenna is a PCB-trace loop antenna (13.9 mm x 10.6 mm) with inductance 450 nH. Installation instruction for the module explains that only this antenna may be used with the device and that the end user shall not be able to access the antenna port or change antenna.*

(v) The modular transmitter must be tested in a stand-alone configuration, i.e., the module must not be inside another device during testing for compliance with part 15 requirements. Unless the transmitter module will be battery powered, it must comply with the AC line conducted requirements found in §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 §15.27(a)). The length of these lines shall be the 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 and commercially available (see §15.31(i)).

*No. PIEX01 module was tested together with POTPIEX01 module because PIEX01 module is designed to operate with POTPIEX01 module and therefore PIEX01 cannot be tested stand-alone. PIEX01 module and POTPIEX01 module were not inside another device during testing. Radiated spurious emissions data and AC conducted emissions data demonstrating compliance with the requirements of Part 15 of the FCC rules for intentional radiators and RSS GEN/RSS 210 has been provided.*

(vi) The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying its FCC identification number.

(A) If using a permanently affixed label, the modular transmitter must be labeled with its own FCC identification number, and, if the FCC identification number 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.

(B) If the modular transmitter uses an electronic display of the FCC identification number, the information must be readily accessible and visible on the modular transmitter or on the device in which it is installed. If the module is installed inside another device, then the outside of the device into which the module is installed must display a label referring to the enclosed module. This exterior label can use wording such as the following: “Contains FCC certified transmitter module(s).” Any similar wording that expresses the same meaning may be used. The user manual must include instructions on how to access the electronic display. A copy of these instructions must be included in the application for equipment authorization.

*Yes. The module is appropriately labeled (refer to the label and label placement drawings contained within this application). Instructions to the end user regarding the labeling requirements for host devices are included in this application.*

(vii) The modular transmitter must comply with any specific rules or operating requirements that ordinarily apply to a complete 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.

*Yes. The module complies with the specific rules and operating requirements for which certification is sought. Instructions to the OEM installer or end user regarding such requirements for use in host devices are included in this application.*

(viii) The modular transmitter must comply with any applicable RF exposure requirements in its final configuration.

*The module is exempt from RF exposure requirements and can be used at any separation distance from the human body.*

<b>RSS GEN Checklist</b>		
Modular approval requirement	Yes	No *
(a) The radio elements must have the radio frequency circuitry must be shielded. Physical/discrete and tuning capacitors may be located external to the shield, but must be on the module assembly.		√
(b) The module shall have buffered modulation/data input(s) (if such inputs are provided) to ensure that the module will comply with the requirements set out in the applicable RSS standard under conditions of excessive data rates or over-modulation.	√	
(c) The module shall have its own power supply regulation on the module. This is to ensure that the module will comply with the requirements set out in the applicable standard regardless of the design of the power supplying circuitry in the host device which houses the module.	√	

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(d) The module shall comply with the provisions for external power amplifiers and antennas detailed in this standard. The equipment certification submission shall contain a detailed description of the configuration of all antennas that will be used with the module.	√	
(e) The module shall be tested for compliance with the applicable standard in a stand-alone configuration, i.e. the module must not be inside another device during testing.		√
(f) The module shall comply with the Category I equipment labelling requirements.	√	
(g) The module shall comply with applicable RSS-102 exposure requirements, which are based on the intended use/configurations.	√	
(h) Is the modular device for an Industry Canada licensed exempt service?	√	
* Please refer to the previous sections for a detailed explanation if the answer is “No.”		

*Best Regards,*



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