

# Robomow®

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Date: January 11, 2018

Ref: LMA Compliance Letter

To: Federal Communications Commission

**Subject: LMA compliance letter**

This letter introduces F. Robotics Acquisitions Ltd.'s request to approve its BLE Robot Board/RF Module ESB9000 according to FCC Limited Modular Approval procedure, and to demonstrate the means to control the module as required by the LMA procedure.

BLE Robot Board P/N: ESB9000 (AKA "RF Module" or "RBLE") is a Bluetooth Low Energy transceiver - SCR chip based module intended to enable robotic lawn mower communicating with external devices.

This model is not sold separately, and is not installed in any units other than F. Robotics Acquisitions Ltd.'s products, and currently it is used in the following hosts:

RX12

RX20

RX50

XR1 150

XR1 300

XR1 500

In any case where the BLE Robot Board P/N: ESB9000 will be added to other hosts in the future, F. Robotics Acquisitions Ltd. will expand the LMA to include the new hosts.

Since the module incorporates an integral antenna its EIRP does not change between the hosts other than changes created by the host units shape influence

Due to all the above mentioned, F. Robotics Acquisitions Ltd feels that the testing conducted by QualiTech EMC Laboratory to the various hosts, with the fact that F. Robotics Acquisitions Ltd. have full control on the sales and installation of the module, assure complete compliance with FCC LMA procedure.

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As per § 15.212 Modular transmitters: Single modular transmitters must meet the following requirements to obtain a modular transmitter approval.		
Requirement	Not Maintained	Maintained
(1) 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.	N/A (it is not shielded, but it is not applied for modular approval)	
(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 over-modulation.		Yes
(3) The modular transmitter must have its own power supply regulation.		Yes
(4) 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 (antenna is permanently attached)
(5) The modular transmitter must be tested in a stand-alone configuration, <i>i.e.</i> , 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)).	N/A (it is not applied for a modular approval)	

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(6) The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying its FCC identification number.		Yes
(7) 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
(8) The modular transmitter must comply with any applicable RF exposure requirements in its final configuration.		Yes

Thank you,  
Signature: \_\_\_\_\_



Printed Name: Shai Abramson  
CTO  
F. Robotics Acquisitions Ltd.