

2018 December 28

American Certification Body, Inc.  
6731 Whittier Ave.  
Suite C110, 2110

Attn: Reviewing and certification engineers

RE: Installation requirements for Gateway High Spec, Mid Spec and Low Spec, FCC ID: 2AETC-000034 IC: 12021A-000034

The Harvey wireless hub has an open-ended user interface that allows the integrator multiple options of use for communication purposes. They are allowed to create their own software that utilizes the Gateway for a variety of automated and manual communications. **The user configurable software interface does not include the radio parameters, which are set during manufacturing.**

The device meets the 4 requirements of KDB 353028)II)A)2)c)iii) for professional installation of antennas.

1. This device is not made available to the average consumer. It is intended only for business-to-business sales.
2. The device will not be made available through any retail outlets and is sold only on a business-to-business basis.
3. The instructions in the user's manual clearly state that the device is for professional use only. There is no functionality of the equipment that would be of any use to a general consumer.
4. The device is sufficiently sophisticated, complex and specialized and must be specifically programmed for each application. The device is only capable of working with professional machinery.

In addition, the specific antenna for use is supplied by the manufacturer and the installation instructions state that only this antenna shall be used.

It also meets the requirements of KDB 594280)D01) sections I, II, III, and IV)C).

- I. General Considerations: The firmware locks down the operation of the 433 MHz radio and the installer has no way of changing it. Although the 433 MHz radio adjusts its duty cycle based on the size of the data packet being sent, this functionality is integral to the firmware and was tested in each possible duty cycle.

- II. Professional Installer and Service Personnel Configuration Controls: Installers and service personnel have no way of adjusting the parameters of the 433 MHz radio. They are locked down in the firmware.
- III. User Configuration Control – The user also has no ability to change the 433 MHz radio parameters.
- IV. C) All CMRS bands are programmed during manufacturing and cannot be modified by the installer or service personnel.

For this reason, it requires professional installation. Regardless of the requirement for professional installation, ultimately, the grantee (Appareo Systems, Inc.) remains responsible for compliance in the final installation of the EUT in all final installations as long as all requirements in the installation manual are followed and the device is not modified in any other way. This includes installing the proper firmware to limit the operation to only compliant modes of operation and also providing the installer with the required information to ensure their software also maintains compliance where required.

Thank you for your assistance, and please contact me if I can answer any additional questions.

Sincerely,



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