



## Request for Modular/Limited Modular Approval

Date: July 8, 2020

Subject: Manufacturer's Declaration for  - Modular Approval  - Split Modular Approval  
 - Limited Modular Approval  - Limited Split Modular Approval

Confidentiality Request for: **2APCG-VUHDF1**

<b>8 Basic Requirements – FCC Part 15.212(a)(1)</b> <b>For Items Marked “NO(*)”, the Limited Module Description Must be Filled Out on the Following Pages</b>		
<b>Modular Approval Requirement</b>	<b>Requirement Met</b>	
<p>1. The modular transmitter must have <b>its own RF shielding</b>. 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 FCC 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 physical crystal and tuning capacitors may be located external to the shielded radio elements. 15.212(a)(1)(i)</p> <p><b>Details:</b> <i>No, this RF Module has no RF shielding and therefore does not comply to this requirement. Limited Modular Approval is instead applied here because it has complied entirely with the requirements in a standalone configuration.</i></p>	<input type="checkbox"/> - YES	<input checked="" type="checkbox"/> - NO(*)
<p>2. The modular transmitter must have <b>buffered modulation/data inputs</b> (if such inputs are provided) to ensure that the module will comply with FCC requirements under conditions of excessive data rates or over-modulation. 15.212(a)(1)(ii)</p> <p><b>Details:</b> <i>Refer to Schematic. The modular transmitter has buffered modulation/data inputs on U100 for BLE and U202 for LoRa.</i></p>	<input checked="" type="checkbox"/> - YES	<input type="checkbox"/> - NO(*)
<p>3. The modular transmitter must have <b>its own power supply</b> regulation on the module. This is intended to ensure that the module will comply with FCC requirements regardless of the design of the power supplying circuitry in the device into which the module is installed. 15.212(a)(1)(iii)</p> <p><b>Details:</b> <i>The transmitter does have internal power regulation and the Power Amplifier has its own regulator. The transmitter is powered by internal regulation from the incoming external power rail (through induction).</i></p>	<input checked="" type="checkbox"/> - YES	<input type="checkbox"/> - NO(*)
<p>4. The modular transmitter must <b>comply with the antenna and transmission system requirements</b> of §§ 15.203, 15.204(b), 15.204(c), 15.212(a), and 2.929(b). 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 15.212(b). 15.212(a)(1)(iv)</p> <p><b>Details:</b> <i>The BLE antenna is an onboard antenna. The LoRa antenna is software controlled to a hardware switch to enable only one of the following at any time: onboard antenna or an external antenna with a unique PCB coupling to satisfy the above requirements. External antenna connector on the host device meets with professional installation requirements as previously described.</i></p>	<input checked="" type="checkbox"/> - YES	<input type="checkbox"/> - NO(*)
<p>5. The modular transmitter must be <b>tested in a stand-alone configuration</b>, 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)). 15.212(a)(1)(v)</p> <p><b>Details:</b> <i>Even though the module does not have shielding it has complied entirely with the requirements in a standalone</i></p>	<input checked="" type="checkbox"/> - YES	<input type="checkbox"/> - NO(*)

*configuration.*

<b>Modular Approval Requirement</b>		<b>Requirement Met</b>	
6. The modular transmitter must be labeled with its own FCC ID number, or use an electron display (see KDB Publication 784748).	If using a permanently affixed label with its own FCC ID number, 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.	<input checked="" type="checkbox"/> - YES	<input type="checkbox"/> - NO(*)
<i>Details: Module is too small to properly contain the FCC ID with font at or above 4pt font size. Therefore, labeling is provided in the online <a href="https://vutiliti.com/manuals">https://vutiliti.com/manuals</a>, per statute requirements.</i>			
7. The modular transmitter must comply with all specific rule or operating requirements applicable to the transmitter, including all the conditions provided in the integration instructions by the grantee. 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. 15.212(a)(1)(vii)		<input type="checkbox"/> - YES	<input checked="" type="checkbox"/> - NO(*)
<i>Details: Integration instructions are not applicable because the Grantee (Vutiliti) controls the integration into final devices.</i>			
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. 15.212(a)(1)(viii)		<input checked="" type="checkbox"/> - YES	<input type="checkbox"/> - NO(*)
<i>Details: Reference RF Exposure MPE calculations. We do not need to create any instructions as we do not intend on selling the FCC Module to any third parties.</i>			

#### **Limited Module Description – When Applicable**

\* If a module does NOT meet one or more of the above 8 requirements, the applicant may request Limited Modular Approval (LMA). This Limited Modular Approval (LMA) is applied with the understanding that the applicant will demonstrate and will retain control over the final installation of the device, such that compliance of the end product is always assured. The operating condition(s) for the LMA; the module is only approved for use when installed in devices produced by grantee. A description regarding how control of the end product, into which the module will be installed, will be maintained by the applicant/manufacturer, such that full compliance of the end product is always ensured should be provided here.

*Details: The Grantee will permanently attach the FCC Module to complimentary host. It is our intention to install the FCC module to ONLY Vutiliti designed host devices.*

Software Considerations – KDB 594280 / KDB 442812 (One of the following 2 items must be applied)		
Requirement	Requirement Met	
1. For <u>non-Software Defined Radio</u> transmitter modules where software is used to ensure compliance of the device, technical description must be provided about how such control is implemented to ensure prevention of third-party modification; see KDB Publication 594280.	<input checked="" type="checkbox"/> - Provided below	<input type="checkbox"/> - N/A
<i>Details: The firmware of the device is preprogrammed offsite prior to manufacturing integration, and the processor is locked out so that it cannot be accessed or modified by any third party. If access is attempted, the processor lock initiates a full wipe of all code, rendering the device useless and non-functional.</i>		
2. For <u>Software Defined Radio (SDR)</u> devices, transmitter module applications must provide a software security description; see KDB Publication 442812.	<input type="checkbox"/> - Provided below	<input checked="" type="checkbox"/> - N/A
<i>Details: Not an SDR.</i>		

Split Modular Requirements		
Requirement	Provided in Manual	
1. For split modular transmitters, specific descriptions for secure communications between front-end and control sections, including authentication and restrictions on third-party modifications; also, instructions to third-party integrators on how control is maintained.	<input type="checkbox"/> - Provided below	<input checked="" type="checkbox"/> - N/A
<i>Details: N/A</i>		

OEM Integration Manual Guidance – KDB 996369 D03 Section 2		
Clear and Specific Instructions Describing the Conditions, Limitations, and Procedures for third-parties to use and/or integrate the module into a host device.		
Requirement		
Is this module intended for sale to third parties?	<input type="checkbox"/> - YES	<input checked="" type="checkbox"/> - No, If No, and LMA applies, the applicant can optionally choose to not make the following detailed info public. However there still needs to be basic integration instructions for a users manual and the information below must still be included in the operational description. <u>If the applicant wishes to keep this info confidential, this will require a separate statement cover letter explaining the module is not for sale to third parties and that integration instructions are internal confidential documents.</u>
<b>Items required to be in the manual – See KDB 996369 D03, Section 2</b>		
As of May 1, 2019, the FCC requires ALL the following information to be in the installation manual. Modular transmitter applicants should include information in their instructions for all these items indicating clearly when they are not applicable.		
For example information on <b>trace antenna design could indicate “Not Applicable”</b> . Also if a <b>module is limited to only a grantees own products and not intended for sale to third parties, the user instructions may not need to be detailed and the following items can be placed in the operational description</b> , but this should include a cover letter as cited above.		
1. List of applicable FCC rules. KDB 996369 D03, Section 2.2	<input type="checkbox"/> - All Items shown to the left are provided in the Modular Integration Guide (or UM) for Full Modular Approval (MA) or LMA.	
a. Only list rules related to the transmitter.		
2. Summarize the specific operational use conditions. KDB 996369 D03, Section 2.3		
a. Conditions such as limits on antennas, cable loss, reduction of power for point to point systems, professional installation info		
3. Limited Module Procedures. KDB 996369 D03, Section 2.4		
a. Describe alternative means that the grantee uses to verify the host meets the necessary limiting conditions		
b. When RF exposure evaluation is necessary, state how control will be maintained such	<input checked="" type="checkbox"/> - An LMA applies	

that compliance is ensured, such as Class II for new hosts, etc.		<p>and is approved ONLY for use by the grantee in their own products, and not intended for sale to 3rd parties as provided in a separate cover letter.</p> <p>Therefore the information shown to the left is found in the theory of operation.</p>
4. Trace antenna designs. KDB 996369 D03, Section 2.5	a. Layout of trace design, parts list, antenna, connectors, isolation requirements, tests for design verification, and production test procedures for ensuring compliance. If confidential, the method used to keep confidential must be identified and information provided in the operational description.	
5. RF exposure considerations. KDB 996369 D03, Section 2.6	a. Clearly and explicitly state conditions that allow host manufacturers to use the module. Two types of instructions are necessary: first to the host manufacturer to define conditions (mobile, portable – xx cm from body) and second additional text needed to be provided to the end user in the host product manuals.	
6. Antennas. KDB 996369 D03, Section 2.7	a. List of antennas included in the application and all applicable professional installer instructions when applicable. The antenna list shall also identify the antenna types (monopole, PIFA, dipole, etc – note that “omni-directional” is not considered a type)	
7. Label and compliance information. KDB 996369 D03, Section 2.8	a. Advice to host integrators that they need to provide a physical or e-label stating “Contains FCC ID: “ with their finished product	
8. Information on test modes and additional testing requirements. KDB 996369 D03, Section 2.9	a. Test modes that should be taken into consideration by host integrators including clarifications necessary for stand-alone and simultaneous configurations. b. Provide information on how to configure test modes for evaluation	
9. Additional testing, Part 15 Subpart B disclaimer. KDB 996369 D03, Section 2.10		

Sincerely,



By:

\_\_\_\_\_  
 Facility Manager  
 (Signature/Title)

\_\_\_\_\_  
 C.L. Payne III (agent)  
 (Print name)