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Modular Approval Declaration Letter

Reason for Amendment (current / obsolete)	Revision History		
	From	То	Approved Date
Initial Release (Obsolete)	1.0	1.0	Dec-04-2006
Added IC Modular Letter (Obsolete)	1.0	2.0	Feb 16 2009
Add LMA and MA option (Obsolete)	2.0	3.0	April 14 2010
Revised per RSS Gen issue 3.0 (Obsolete)	3.0	4.0	Jan 12 2011
Removed Foot(2) (obsolete)	4.0	5.0	July 19 2011
Adding New note per KDB996369 D01 V01R03 (obsolete)	5.0	6.0	August 29 2011
Updated company template & Added text box (obsolete)	6.0	7.0	Jan-31-2012
Updated modular requirement (obsolete)	7.0	8.0	Sept 05 2014
Updated template to meet RSP 100 issue 10 (obsolete)	8.0	9.0	Nov 20 2014
Updated template to meet RSP 100 issue 11 (obsolete))	9.0	10.0	March 19 2015
Revised the Modular Requirement statements (current)	10.0	11.0	July 28, 2016

SHENZHEN OTTO INTELLIGENCE TECHNOLOGY CO LTD

02/15/2019

FCC ID: 2APO6OTTOBMB

is seeking FCC Authorization as a Single Modular transmitter / Single Limited Modular Approval (Please	check one
The EUT meets the requirements for Single Modular approval / Single Limited Modular Approval	please	check one
as detailed in KDB 996369. Compliance to each of the requirements is described below:		

Item	Modular requirement	Yes	No	Please provide a detailed explanation if the answer is "No."
1	Have its own RF shielding	Υ		
2	Have buffered modulation/data inputs (if such inputs are provided)	Υ		
3	The modular transmitter must have its own power supply regulation.	Υ		
4	Meet the antenna requirements of section 15.203	Υ		
5	Be tested in a stand-alone configuration, i.e., the antenna, AC or DC power and data input/output lines must be connected to the module but, the module must not be inside another case during testing.	Y		
6	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.	Y		
7	The modular transmitter is manufactured so that the user can not influence the operation of the transmitter that will operate outside of the scope of the regulations.	Y		
8	Address compliance with the Commission's RF exposure limits in Sections 1.1310 and 2.1093.	V		

Note:

- (1) LMA may be granted when one or more of the requirements in the table above cannot be demonstrated.

 LMA will also be issued in those instances where applicants can demonstrate that they will retain control over the final installation of the device, such that compliance of the end product is assured. In such cases, an operating condition on the LMA for the module must state that the module is only approved for use when installed in devices produced by a specific manufacturer.

 When LMA is sought, the application for equipment certification must specifically state how control of the end product into which the module will be installed, and will be maintained, such that full compliance of the end product is always ensured.
- (2) Please provide Clear and specific instructions describing the conditions, limitations and procedures for third-parties to use and/or integrate the module into a host device.

 (3) For non-Software Defined Radio transmitter modules where software is used to ensure compliance of the device, technical description of how such control is implemented.
- 3) For non-Software Defined Radio transmitter modules where software is used to ensure compliance of the device, technical description of how such control is implemented to ensure prevention of third party modification must be provided (see KDB 594280).

Note 1: Compliance of a module in its final configuration is the responsibility of the applicant. A host device will not be considered certified if the instructions regarding antenna configuration provided in the original description, of one or more separately certified modules it contains, were not followed. **Example:** A separately certified low-power transceiver module using Bluetooth technology which is housed in a desktop computer, laptop or peripheral does not require the overall system to be recertified, if the desktop computer, laptop or peripheral, as a stand-alone unit, complies with all applicable technical standards.

Client's signature

Client's name / title: Vicky Chen/ Sales

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