

August 3, 2022

Federal Communications Commission Equipment Authorization Branch 7435 Oakland Mills Road Columbia, MD 21046

## Request for Modular / Limited Modular Approval

FCC ID: 2AQL3PR01737

## The following attestation addresses the requirements to support modular approval:

| Modular approval requirement   | Yes (provide brief statement)   | No *   |
|--|---|--|
| (1) The radio elements must have its own radio frequency circuitry shielded. The physical crystal and tuning capacitor(s) may be located external to the shield, but must be on the module assembly  |   | PR-01737 is not dependent on any component or characteristic of the device into which it is embedded. Shielding is accomplished through a combination of copper planes, guards, and vias in the PCB. The result is a design that has been proven to be insensitive to outside influence. 13.56 MHz operating frequency helps in achieving this result. |
| (2) The module must have buffered modulation/data inputs (if provided) to ensure that the device will comply with FCC requirements under conditions of excessive data rates or over-modulation.  | PR-01737 provides 96 bytes FIFO for buffering the data received by the module.  |  |
| (3) The module must contain its own power supply 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.  | PR-01737 contains its own power supply regulation. Please refer to schematic filed with this application  |  |
| (4) The module must comply with the antenna and transmission system requirements 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) | The module has a direct connection to the antenna. The module and antenna are on the same PCB board. Refer to image provided with this application. |  |
| (5) The module must demonstrate compliance in a stand-alone configuration, the module must not be inside another device during testing. This is intended to demonstrate that the module can comply with Part 15 emission limits regardless of the device into which it is eventually installed.  | The module was tested stand-alone as shown in test setup photographs filed with this application  |  |
| (6) The module must be labelled with its permanently affixed FCC ID label, or use an electronic display (See KDB Publication 784748 about labelling requirements)  | The FCC ID will be printed on the RFID board. First batch of boards will have a label containing the FCC ID   |  |
| (7) The module 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.   | The module complies with FCC Part 15C requirements. Instructions to the OEM installer are provided in the assembly procedure.                       |  |
| (8) The module must comply with any applicable RF exposure requirements  | PR-01737 complies with all exposure requirements.   |  |

## THALES

## **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.

\* Please provide a detailed explanation if the answer is "No."

Sincerely,

Signed:

Signature date: August 3, 2022

Applicant name: Jesse Simbe

Applicant title: Compliance Specialist