

KDB 996369 cover letter

The device is intended to be approved as a modular approval.

The device is subject to the requirements of KDB 996369 D03, Section 2.2 – 2.10:

2.2 This device is for use with FCC Part 15.225 only

2.3 Summarize the specific operational use conditions = The device has only one use and one antenna. There is only 1 output power option and 1 modulation/data rate.

2.4 Limited module procedures – This is a request for full modular approval.

2.5 Trace antenna designs – the device will never utilize a trace antenna. The antenna is supplied with the module and connected permanently to a PCB with a trace cannot be modified. Page 5, 2nd notice of the user's manual warns the user "Changes or modifications to this device not expressly approved by LabStrong Corp. could void the user's authority to operate the equipment."

2.6 RF Exposure considerations – the device is categorically excluded from RF exposure evaluation.

2.7 Antenna – the device is to be installed with only 1 antenna option. The antenna is supplied with the module and connected permanently to a PCB with a trace cannot be modified. Page 5, 2nd notice of the user's manual warns the user "Changes or modifications to this device not expressly approved by LabStrong Corp. could void the user's authority to operate the equipment."

2.8 The host device will be labelled with "Contains FCC ID" as described in the user's manual, Page 6, second notice.

2.9 Information on test modes and additional testing requirements – The NFC device transmits on only 1 frequency and requires a card to be activated. That is the only test mode.

2.10 Additional testing, Part 15 Subpart B disclaimer – the user's manual, first notice of Page 6 states:

The FCC requires the OEM to be notified that any changes or modifications not expressly approved by LabStrong may void the user's authority to operate the equipment. While an application of the EA00351 NFC Controller in a product is not required to obtain a new FCC authorization for the module, this does not preclude the possibility that some other form of authorization or testing may be required for that end product.