January 29, 2020

Dear FCC Examiner,

We are applying for FCC certification of an IoT Media Gateway with 3G, LTE, BLE , with FCC ID: 2AVFL-50700305

The Device integrates the following pre-certified radio modules,

- Microchip Technology Inc., WiFi(*)/BT module with FCC ID: 2ADHKWILC3000, single modular approval, grant issued 12/16/2016, (*WiFi not activated, see note below)

- Quectel Wireless Solutions Company Limited, WCDMA and LTE cellular wireless module with FCC ID: XMR201808EC25AF, single modular approval, grant issued 08/03/2018

Based on FCC KDB 996369 D02 Module Q&A 1 and due to documented equality of the WiFi/Bluetooth and the cellular radio portions (the modules remain completely unchanged in SW, FW, HW when integrated to our host product) we claim validity of the test results from the following radio test reports as filed for the modular approvals:

Test reports filed under FCC ID: 2ADHKWILC3000: #D60104R1, issued by Compatible Electronics Inc., issued on January 4, 2016.

Test reports filed under FCC ID: XMR201808EC25AF: #R1806A0301-R1V1, #R1806A0301-R2V1, #R1806A0301-R3V1, #R1806A0301-R4V1; all reports issued by TA Technology (Shanghai) Co., Ltd., all reports issued on July 31, 2018.

We confirm that the above listed pre-certified radio modules are integrated strictly according to the respective integration manuals and according grant conditions, and thus, that the leveraged test results from the above listed reports are representative for the same radios being part of our end-product.

The laboratory of TUV Rheinland of North America has verified that there were no changes in the applicable rule parts and measurement procedures which would call for re-application of testing.

Radiated spurious emissions, output power, and co-location spot check testing has been applied for verification of continued compliance, as documented in the relevant EMC reports filed with this application.

Our product will be professionally installed and operated in fixed RF exposure condition with more than 20 cm distance from human body parts.

The cellular and BLE radios can transmit simultaneously. However, with only about 5mW EIRP the contribution of the BLE radio to the total power density at > 20cm distance is neglectible in relation to the theoretical maximum power density stemming from the cellular radios, as documented in the MPE report #R1806A0301-M1V3 filed under the cellular FCC ID: XMR201808EC25AF. Therefore we consider the worst case calculations and results from this MPE report to be sufficient to show compliance of the entire host equipment with RF exposure rules.

Note: Only the BLE radio function is used from this module for the host product certification subject to this assessment. The WiFi function is de-activated.
We are aware that activation of the WiFi function will require additional certification through a TCB under a Class 2 Permissive Change Request.

Schindler Elevator Corporation

Guy Monhollen, PM, System Architect

Signature