



VeriFone (UK) Ltd
Symphony House
7 Cowley Business Park
Cowley, Uxbridge
UB8 2AD, United Kingdom

October 12, 2009

FCC ID: B321619-20XPL

Limited Modular Approval Request Letter

VeriFone (UK) Ltd formally requests limited modular approval for radio module assembly "Contactless Card Reader Module 1619-20x PL". This module has been tested with host equipment PPCR002 and PPCR003 which, combined with this module implement respectively equipment for subway and bus transit payment by means of a contactless payment card. The difference between PPCR002 and PPCR003 is that the '002 is AC powered for installation into a subway turnstile whilst the '003 is 24 Volt DC battery powered for use on a bus.

To ensure compliance full testing of the module with each host was performed to Part 15.225 and reports have been issued detailing results for the module with each host.

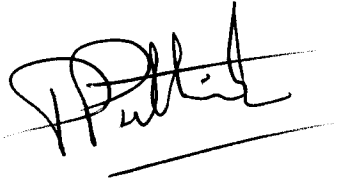
The requirements of public notice DA00-1407 have been met as shown by the following statements:

1. "The modular transmitter must have its own RF shielding." This is present as part of the reader assembly.
2. "The modular transmitter must have buffered modulation / data inputs." This is incorporated on the reader assembly PCBs.
3. "The modular transmitter must have its own power supply regulation." This is incorporated as part of the reader assembly PCBs.
4. "The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204". The Contactless Card Reader Module 1619-20x PL meets the FCC antenna requirements by virtue of the fact that it is fitted with a permanently attached integral antenna which cannot be replaced by the installer. It can only operate with this antenna. The antenna is shown in the Hardware Photos exhibit.
5. "The modular transmitter must be tested in a stand alone configuration." As a limited modular approval, the module has been fully tested with both its intended hosts – PPCR002 and PPCR003. This was necessary to ensure the modular transmitter was compliant in its intended (normal) modes of operation.
6. "The modular transmitter must be labelled with its own FCC ID number." As an LMA the label will be attached to the host equipment with which the modular transmitter will be deployed as an integral part.
7. "The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter and the manufacturer must provide adequate instructions along with the module to explain any such requirements." The

module complies with the specific requirements of Part 15.225. The module is incorporated into PPCR002 and PPCR003 and will only be supplied by VeriFone as part of these equipments.

8. "The modular transmitter must comply with any applicable RF exposure requirements." Due to the low frequency of 13.56 MHz and extremely low output power of the device the RF exposure requirements do not apply.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. Puttick', with a horizontal line drawn underneath it.

Peter Puttick
Senior Approvals Manager
VeriFone (UK) Ltd.
peter_p1@verifone.com