

4/23/2015

Subject: Limited Modular Approval for Model: AVO-BTWI, FCCID: B4Z-958-BTWI

Dear Application Examiner:

UTC Fire & Security, Model AVO-BTWI, FCCID: B4Z-958-BTWI does not fully comply with Modular Approval requirements in FCC 15.212 (a) as shown below and is therefore seeking Limited Modular Approval under FCC 15.212 (b). The radio meets the requirements for Limited Modular approval when installed in either of 2 different hosts sold by UTC Fire & Security:

Model AVO-1037 AdvisorOne Security Panel

Model AV-TS7 Advisor 7" Touchscreen

1. **"The modular transmitter must have its own RF shielding."** The radio portion of the module is contained in its own RF shielding. The shielding is installed at the factory. Please see the Internal Photos exhibit.
2. **"The modular transmitter must have buffered modulation/data inputs."** The EUT does not have buffered data inputs to insure compliance with Part 15 requirements under conditions of excessive data rates or over-modulation. Please see the Schematics exhibit.
3. **"The modular transmitter must have its own power supply regulation."** The EUT has its own power supply regulation to insure compliance with Part 15 requirements regardless of the quality or level of external DC supplying the module from the host unit. Please see Schematics exhibit. Also, the technical report exhibit contains AC power line conducted emissions data taken with the EUT powered from a linear power supply that contains no EMC suppression components.
4. **"The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c)."** The EUT meets the FCC antenna requirements. Please see Antenna information exhibit and internal photos exhibit.
5. **"The modular transmitter must be tested in a stand-alone configuration."** The EUT was not tested in a stand-alone configuration but was tested in the 2 hosts listed above. Please see test setup photos exhibit and technical report exhibit.
6. **"The modular transmitter must be labeled with its own FCC ID number."** The EUT is labeled with its own FCC ID number. Please see FCC ID label & location exhibit. If the FCC ID number will not be visible when the module is installed inside a host device, another label with the FCC ID will be applied to the exterior of the host device.
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 EUT is compliant with all applicable FCC rules. Detail instructions for maintaining compliance are given in the User Manual.
8. **"The modular transmitter must comply with any applicable RF exposure requirements."** The EUT is compliant with all applicable RF exposure requirements. Please see RF Exposure Exhibit.

Control of the host configurations above is achieved in the following manner:

AV-TS7: The AVO-BTWI module will be installed at the factory.

AVO-1037: The AVO-BTWI module will be installed at the factory in certain kit configurations or professionally installed per detailed installation instructions shipped with each module if purchased separately.

Please contact me if you have additional questions. Your attention to this matter is greatly appreciated.

Best regards,

Paul J Price

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