

4/23/2015

## **Subject: Limited Modular Approval for Model: AVO-ZW, FCCID: B4Z-959-ZW**

Dear Application Examiner:

**UTC Fire & Security, Model AVO-ZW, FCCID: B4Z-959-ZW** 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 the below host sold by UTC Fire & Security:

Model AVO-1037      AdvisorOne Security Panel

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 from the original filing.
3. **“The modular transmitter must have its own power supply regulation.”** The EUT has its own power supply regulation to ensure 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 in original filing and the internal photos exhibit from the current filing.
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 host listed above. Please see test setup photos exhibit and technical report exhibit from the original filing.
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. Per FCC KDB 784748 D01 v08 Section 8, it is not necessary to label the host device as the module label is easily accessed with commonly used methods.
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 from the original filing.

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

AVO-1037: The AVO-ZW module may 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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