



September 17, 2013
Timco Engineering, Inc.
849 N.W. State Road 45
P.O. Box 370
Newberry, Florida 32669 USA

Re: Application for a Class 2 Permissive Change to a Limited Single Modular Request for RFID Device,
FCC ID: BVCIDX8000NA
IC: 3506A-IDX8000NA

Dear Sir or Madam:

In order to improve margins for spurious emissions, the output filter was re-designed to sharpen the rolloff and move the cutoff closer to the fundamental. The new data for affected measurements is included in the test report. It shows an improved emissions profile.

*****Below is the previous cover letter.*****

Pursuant to Section 15.212 (b) of the FCC Rules and IC RSS-Gen I 3 2010 Sections 3.2.2 and 3.2.3;

“(b) A limited modular approval may be granted for single or split modular transmitters that do not comply with all of the above requirements, *e.g.* , shielding, minimum signaling amplitude, buffered modulation/data inputs, or power supply regulation, if the manufacturer can demonstrate by alternative means in the application for equipment authorization that the modular transmitter meets all the applicable part 15 requirements under the operating conditions in which the transmitter will be used. Limited modular approval also may be granted in those instances where compliance with RF exposure rules is demonstrated only for particular product configurations. The applicant for certification must state how control of the end product into which the module will be installed will be maintained such that full compliance of the end product is always ensured.”

This device generates a series of pulses per 15.247 in the 902-928 MHz band and is used to activate RFID tags and detect the data on those tags. The transmitter drives patch antennas one at a time to establish a coupling field that interacts with any tags present. The first two models of this present implementation are an 8 port and a 2 port versions. There are plans to add a 4 port version. Using one transmitter board with different number of RF ports populated which can be used for each configuration would be an advantage in time to market.

The transmitter complies with the modular requirements.
The transmitter radio elements are shielded, see internal photos.
There are no modulation/data input to be buffered.
The radio has its own regulated power supply.
The antenna connectors are reverse polarity SMA to MMX to connect to only approved antennas.
The radio was tested as stand alone, not installed in any other device.
There is a permanently affixed label with FCC ID number.

The transmitter does not comply with all the modular requirements.
It is not available to be installed into any other systems or devices outside of the applicants' control in manufacturing.
Testing and results indicated in the test report, demonstrate that the transmitter meets the general radiated limits of 15.209 and also the conducted limits of 15.207.

Therefore, as we the applicant will always maintain control of the end product by manufacturing the transmitter board into a variety of chassis, all to perform the same function of detecting RFID tags, we are applying for a Limited Modular approval.

Sincerely,

William D. Owsley
Principal EMC Engineer
Sensormatic Electronics, LLC.
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Boca Raton, FL. 33487