

**Curtis-Straus LLC  
Attn: Jon Curtis/Barry Quinlan  
527 Great Road  
Littleton, MA 01460**

**July 10, 2001**

**FCC ID: DJU-WOPI042001**

Gentlemen:

Per our recent conversation, EMC Automation, a TDK Group Company is revising its product certification efforts on the behalf of American Innovations. The Wireless Optical Pulse Initiator (WOPI) is to be certified as a modular transmitter. Our justification for this is as follows:

*1. The modular transmitter must have its own RF shielding. This is intended to ensure that the module does not have to rely upon the shielding provided by the device into which it is installed in order for all modular transmitter emissions to comply with Part 15 limits. It is also intended to prevent coupling between the RF circuitry of the module and any wires or circuits in the device into which the module is installed. Such coupling may result in non-compliant operation.*

The heart of the WOPI is the RFM TX6000 Hybrid Transmitter. The hybrid is encased in a metal can. Testing of the WOPI did not detect any non-compliant emissions inside the intended device or outside of it.

*2. The modular transmitter must have buffered modulation/data inputs (if such inputs are provided) to ensure that the module will comply with Part 15 requirements under conditions of excessive data rates or over-modulation.*

The modular transmitter module has an on-board Atmel ATtiny 15L® microcontroller that provides the necessary buffering.

*3. The modular transmitter must have its own power supply regulation. This is intended to ensure that the module will comply with Part 15 requirements regardless of the design of the power supplying circuitry in the device into which the module is installed.*

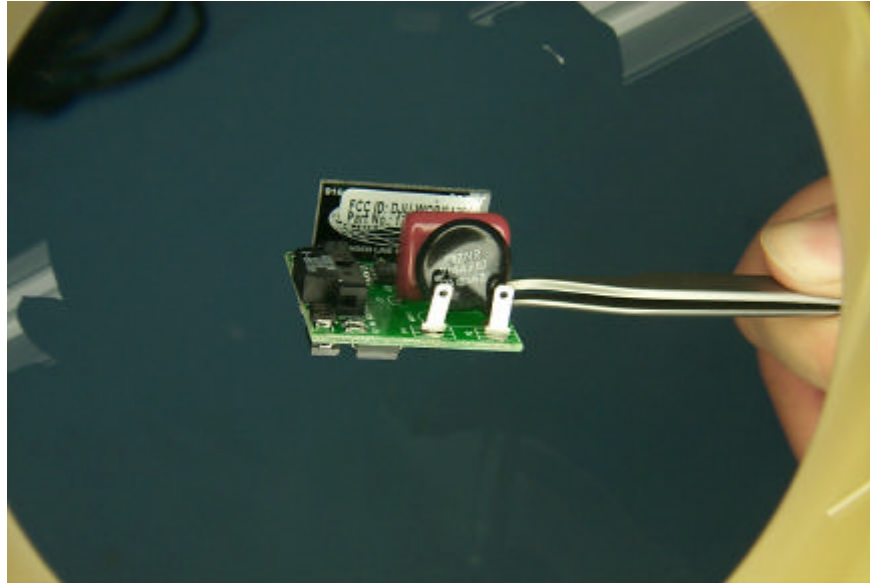
The RFM TX6000 Hybrid has a supply voltage requirement of 2.7-3.5 Vdc. This supplied by a power supply regulator circuit built around the LP2985 micropower regulator. This circuit provides the necessary regulation and also protects the module against transients.

*4. The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c). The antenna must either be permanently attached or employ a*

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*“unique” antenna coupler (at all connections between the module and the antenna, including the cable). Any antenna used with the module must be approved with the module, either at the time of initial authorization or through a Class II permissive change. The “professional installation” provision of Section 15.203 may not be applied to modules.*

The WOPI has an antenna soldered to its PCB. A photo is provided below. The actual antenna has the device FCC label on it.



*5. The modular transmitter must be tested in a stand-alone configuration, i.e., the module must not be inside another device during testing. This is intended to demonstrate that the module is capable of complying with Part 15 emission limits regardless of the device into which it is eventually installed. Unless the transmitter module will be battery powered, it must comply with the AC line conducted requirements found in Section 15.207. AC or DC power lines and data input/output lines connected to the module must not contain ferrites, unless they will be marketed with the module (see Section 15.27(a)). The length of these lines shall be length typical of actual use or, if that length is unknown, at least 10 centimeters to insure that there is no coupling between the case of the module and supporting equipment. Any accessories, peripherals, or support equipment connected to the module during testing shall be unmodified or commercially available (see Section 15.31(i)).*

Preliminary scans of the device did not indicate any differences in the performance of the modular transmitter whether or not it was installed in a power meter. Conducted emissions were made of the line-powered module and the results were satisfactory to Part 15 requirements. Only line connections are made to the module. Data transmission is made through the wireless link. In any case, these lines do not need ferrites.

6. *The modular transmitter must be labeled with its own FCC ID number, and, if the FCC ID is not visible when the module is installed inside another device, then the outside of the device into which the module is installed must also display a label referring to the enclosed module. This exterior label can use wording such as the following: “Contains Transmitter Module FCC ID: XYZMODEL1” or “Contains FCC ID: XYZMODEL1.” Any similar wording that expresses the same meaning may be used. The Grantee may either provide such a label, an example of which must be included in the application for equipment authorization, or, must provide adequate instructions along with the module which explain this requirement. In the latter case, a copy of these instructions must be included in the application for equipment authorization.*

The picture above shows the label installed on the transmitter module.

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. A copy of these instructions must be included in the application for equipment authorization. For example, there are very strict operational and timing requirements that must be met before a transmitter is authorized for operation under Section 15.231. For instance, data transmission is prohibited, except for operation under Section 15.231(e), in which case there are separate field strength level and timing requirements. Compliance with these requirements must be assured.*

This device is designed for operation per requirements of Part 15.249 not Part 15.231. The hybrid transmitter itself has been specifically designed for 15.249. The operator’s manual has been sent with this submittal.

8. *The modular transmitter must comply with any applicable RF exposure requirements. For example, FCC Rules in Sections 2.1091, 2.1093 and specific Sections of Part 15, including 15.319(i), 15.407(f), 15.253(f) and 15.255(g), require that Unlicensed PCS, UNII and millimeter wave devices perform routine environmental evaluation for RF Exposure to demonstrate compliance. In addition, spread spectrum transmitters operating under Section 15.247 are required to address RF Exposure compliance in accordance with Section 15.247(b)(4). Modular transmitters approved under other Sections of Part 15, when necessary, may also need to address certain RF Exposure concerns, typically by providing specific installation and operating instructions for users, installers and other interested parties to ensure compliance.*

The transmitter is low-power, the peak is 0.75mW. Further the intended application of this module (AC power meters) does not involve close proximity to human body (i.e. like a cellular phone). Therefore any SAR testing is not necessary.



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Please let me reiterate our request for confidentiality requested in our initial cover letter.  
If you have any questions, do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'Michael E. Hill'. The signature is written in a cursive style and is positioned to the left of a vertical line.

Michael E. Hill, NCE  
Test Facility Manager