

28 September 2004

TCB
TUV America Inc
10040 Mesa Rim Road
San Diego CA 92121

Dear Sir or Madam

We, Bureau d'Electronique Appliquee (B.E.A.) Inc [100 Enterprise Drive, RIDC Park West, Pittsburgh PA 15275], are requesting Limited Modular Approval (LMA) on the 24 GHz Transceivers with Antenna Configuration and hereby declare that the 24 GHz Transceivers with Antenna Configuration will only be integrated into Bureau d'Electronique Appliquee (B.E.A.) Inc products. Therefore, Bureau d'Electronique Appliquee (B.E.A.) Inc will retain full control of final installation

No user's manual exist for this product since Bureau d'Electronique Appliquee (B.E.A.) Inc is the integrator. However, the following regulatory notices will be included in the end product manuals.

This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation.

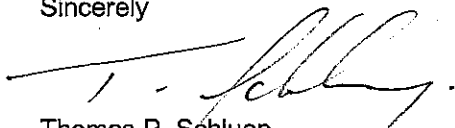
This device contains FCC ID: G9B-305015
IC: 4680A-305015

CAUTION: Changes or modifications not expressly approved by Bureau d'Electronique Appliquee (B.E.A.) Inc could void the user's authority to operate the equipment.

The end-user will also be instructed to ensure that 20 cm separation is maintained between antenna and human.

In addition, the wording "Contains FCC ID: G9B-305015 / IC: 4680A-305015" will be included on the label of the device in which the 24 GHz Transceivers with Antenna Configuration is installed.

Sincerely



Thomas P. Schluep
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We open up New Horizons

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BEA GROUP
COMPANY



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10/22/2004

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RE: FCC ID: submittal as modular device

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 waveguide module is inherently shielded. The cavity of the transceiver and the output waveguide are made inside a die casting part who is preventing any leakage. Furthermore, all connections to the transmit and receive diodes are decoupled by the chokes and the absorbing material used inside the waveguide assembly.

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.

Not applicable. The transmitter transmits no data.

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 modular transmitter does not have its own power supply regulation. However, as construction of the final products integrating this module remain under the control of BEA Inc, BEA Inc will ensure that only a regulated 5VDC supply is used to power the module.



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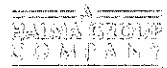
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- 4. The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c). The antenna must either be permanently attached or employ a "unique" antenna coupler (at all connections between the module and the antenna, including 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.

According to the modules, either the antenna is integral, or only a limited set of antennas, approved by us is accepted. The coupling is unique . No problem

- 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)).

The radiation tests are made without cover of the detector which uses the transceiver. there is no problem of compliance with AC line conducted requirements. No problem since the device does not connect to the AC line.

- 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.

Please see attached photos where placement of stickers is indicated.



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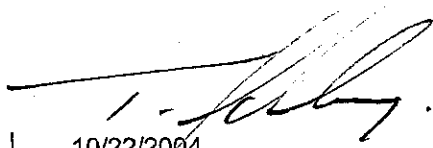
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- 7. The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter and the manufacturer must provide adequate instructions along with the module to explain any such requirements. A copy of these 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.

All the transmit / receive characteristics are factory set. Once for all, there is no need for adjustment. The transmitter is only operated in CW. No data transmission

- 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.

No problem, the sensor complies to all of the above.


 10/22/2004
 Thomas Schlupe



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