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March 4, 20088

Federal Communications Commission
c/o Northwest EMC, Inc.
22975 NW Evergreen Parkway, # 400
Hillsboro, Oregon 97124

RE: PART 15 UNLICENSED LIMITED MODULAR TRANSMITTER APPROVAL

Gentlemen,

On behalf of General Dynamics Itronix, Corporation we request a Limited Modular Approval for the FCC ID: KBCIX-GUBTC41MTH when embedded within the IX350 Host Tablet PC.

Pubic Notice: DA-00 1407 sets forth the requirements and policies for the authorization of unlicensed, low power "transmitter modules" for operation under Part 15 of the Commission's Rules. In accordance with this Public Notice; the FCC ID: KBCIX-GUBTC41MTH, Bluetooth 2.0 EDR, PAN can be considered a transmitter module. The device has a complete RF transmitter, its own reference oscillator, and antenna. The only connectors to the module are power supply and modulation/data inputs.

The FCC ID: KBCIX-GUBTC41MTH, Module complies with the seven of the eight criteria listed below for modular transmitters. The exception is Item 5. The PAN was embedded within the Host Model: IX350 during the testing and was not stand alone as required in the Public Notice.

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.
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.
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.
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.
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)).

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.
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.
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.

If compliance with one or more of the numbered requirements, listed above, cannot be demonstrated, it may be possible to obtain a "Limited Modular Approval" (LMA) which is what we are requesting. The Grantee, General Dynamics Itronix, Corporation will retain control over the final installation of the embedded antennas and the device during production of the IX350, such that compliance of the end product is assured.

Thank you for consideration of our request for Limited Modular Approval.

Best Regards,



Rod Munro
President, Spectrum Technology, Inc.
Agent for General Dynamics Itronix, Corporation