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July 18, 2013

Dear Application Examiner:

Digital Control Incorporated is submitting an application for a limited modular approval FCC Grant of our DigiRadio2 module, model: DR2, FCC ID: KKGB2DIG1 for installation in in DigiTrak® brand devices. The radio meets the requirements for limited modular approval as detailed in FCC 15.212. Compliance to each of the requirements is described below:

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 external photos exhibit.
2. **“The modular transmitter must have buffered modulation/data inputs.”** The EUT has buffered data inputs to insure compliance with Part 90 and 15 requirements under conditions of excessive data rates or over-modulation. Please see the Schematics exhibit.
3. **“The modular transmitter must have its own power supply regulation.”** The EUT has its own power supply regulation to insure 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. Note that the EUT will only be installed by the Grantee in the Grantee's host devices which are battery powered only – no provision for connection to the AC mains.
4. **“The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c).”** The EUT uses an antenna that is integral to the host device. It meets the FCC antenna requirements. Please see Antenna information exhibit and external photos exhibit.
5. **“The modular transmitter must be tested in a stand-alone configuration.”** The EUT was tested in a stand-alone configuration. The module was greater than 10 cm from the host device. Please see test setup photos exhibit and technical report exhibit.
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.
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.”** Limited modular approval is sought because the EUT will only be installed by the Grantee in the Grantee's host devices. The Grantee's host devices determine the operating frequency range of the EUT. The frequency range cannot be changed by anyone other than the grantee at the factory. This is compliant with FCC KDB 594280. Please see the operational description. The EUT is compliant with all other 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.

Please contact me if you have additional questions. Your attention to this matter is greatly appreciated.

Best regards,

Thomas J. Hall
General Counsel