



Attestation Letter

To whom it may concern,

I am writing this letter in support of Secure Care Products LLC application for certification of several Ultra-Wideband products to the requirements of the following FCC regulations. I would like to respond in kind to each point in this section supporting our product submittals. Our system comprises a fixed indoor UWB infrastructure of network nodes and receivers. This infrastructure is critical to the management of people and assets. Our UWB tags are mobile and typically attached to valuable assets, infants and/or dementia patients. The purpose of the system is to prevent these people and assets from leaving a facility or otherwise getting “outside”.

The system is designed to alert users if any of these tags leaves a facility. In the absence of an UWB beaconing signal the system will create such an alert. Many UWB tags also employ a 433.92 MHz “cut-band” radio that issues a similar alert if the tag leaves the facility or locks exits if it is removed from a patient/asset. Some other tags also employ a “door” frequency that serves to lock egress doors in the event a tag nears an exit.

§15.517 Technical requirements for indoor UWB systems.

(a) Operation under the provisions of this section is limited to UWB transmitters employed solely for indoor operation. The system relies on a fixed indoor infrastructure design for indoor environments.

(1) Indoor UWB devices, by the nature of their design, must be capable of operation only indoors. The necessity to operate with a fixed indoor infrastructure, e.g., a transmitter that must be connected to the AC power lines, may be considered sufficient to demonstrate this. The system is designed to accurately track people and assets that are intended to stay indoors. The system alerts users to loss of signal and tags near exits. In some cases the system will lock doors preventing egress from monitored facility. At a minimum the system will notify staff that a tagged asset or patient has attempted to leave the facility and should be retrieved/returned to monitored area.

(2) The emissions from equipment operated under this section shall not be intentionally directed outside of the building in which the equipment is located, such as through a window or a doorway, to perform an outside function, such as the detection of persons about to enter a building. System setup is designed to maximize coverage of the indoor monitored area. No instructions are provided or intentions made to broadcast outdoors.



(3) The use of outdoor mounted antennas, e.g., antennas mounted on the outside of a building or on a telephone pole, or any other outdoors infrastructure is prohibited.

Antennas are designed into indoor products with no provisions for outdoor environments.

(4) Field disturbance sensors installed inside of metal or underground storage tanks are considered to operate indoors provided the emissions are directed towards the ground.

There are no field disturbance sensors as part of this system.

(5) A communications system shall transmit only when the intentional radiator is sending information to an associated receiver. UWB transmitters broadcast a beacon signal at regular intervals as necessary to provide accurate and timely location information of each tag. This communication is one way from tag to receiver only.