



March 19, 2009

**Re: FreeWave Technologies, Inc. (Grantee Code: KNY)
FCC ID No. KNY-1521131FFF
Request for Modular Transmitter Approval
Model Number I2-series**

Dear Sir or Madam:

FreeWave Technologies, Inc. ("FreeWave") requests a Modular Transmitter Approval to its equipment authorization (FCC ID No. KNY-1521131FFF) for its 900 MHz modular FHSS Transmitter (Model No. I2-Series). The purpose of this request is to allow the modular transmitter to be installed in devices manufactured by qualified vendors other than FreeWave.

On or about April 1, 2009 FreeWave will receive a grant of equipment authorization for the I2-Series modular transmitter from Elite Electronic Engineering, Inc. (Elite), a Telecommunications Certification Body.¹ Elite approved the device under the Commission's procedures for Limited Modular Approvals ("LMA") contained in Public Notice DA 00-1407.² Under these procedures, the manufacturer of a modular transmitter may obtain an LMA by committing that it either: (1) will install the module only in devices produced by a specific manufacturer, typically the grantee; or (2) can demonstrate that it will retain control over the final installation of the device such that compliance of the end product is assured.³

FreeWave satisfies the requirements for the second alternative. The I2-Series FHSS transmitter is installed in a NEMA enclosure and professional installation of the antenna used with the device is required. The device is not sold to the general public and FreeWave's sales department personnel are instructed as to this restriction to ensure that no sales to the general public occur. In addition, FreeWave provides its customers with antenna installation instructions and transmitter operating conditions for satisfying RF exposure compliance. FreeWave further ensures proper installation procedures are communicated to the professional installer responsible for the installation of the product. In sum, FreeWave regulates the distribution and installation of the transmitter to ensure full compliance with the requirements for limited modular approvals set forth in Public Notice DA 00-1407.

¹ See Grant of Equipment Authorization, FreeWave Technologies, Inc., FCC ID No. KNY-1521131FFF (April 1, 2009).

² See Part 15 Unlicensed Modular Approval, Public Notice, DA 00-1407 (June 26, 2000).

³ See *id.*



Accordingly, FreeWave respectfully requests that the grant (FCC ID No. KNY-1521131FFF) should read as follows:

“The antenna(s) to be used with this limited modular transmitter must be installed to provide a separation distance of at least 6 cm from all persons and must not be co-located or operating in conjunction with any other antenna or transmitter. This device must be installed in NEMA enclosures. End-user and installers must be provided with antenna installation and transmitter operating conditions for satisfying RF exposure compliance. Professional installation of this product is required.”

In accordance with Section 2.1043(b)(2) of the Commission’s rules, FreeWave confirms that the I2-Series radio transceiver will not be marketed with the changes requested herein prior to the grant of this request.

Please direct any questions concerning this request to the undersigned or to counsel for FreeWave, Henry Goldberg, Esq., at (202) 429-4900.

Respectfully undersigned,

A handwritten signature in black ink that reads "Rich Arment".

Rich Arment
Engineer,
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