

We request a Modular Approval for FCC ID: N6SGBIR16. The Modular Approval requirements are addressed below:

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 M07577B001 card reader has its own security shield that also functions as an electrical shield. Additionally the plastic housing acts to prevent coupling to nearby cabling/electronics components and provides mechanical protection.

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.

The modular transmitter does not have a modulation input. There are no commands or external signals from the host electronics that can change performance characteristics or RFID functionality of the transmitter.

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 transmitter has its own power supply regulation. It contains an internal DC to DC converter which converts the incoming DC to +5VDC. The converter output is fed to a regulator I.C. which supplies regulated 3.3 VDC to the modules electronics. (see Panasonic schematics for further circuit details)

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.

This module uses a unique coaxial connector manufactured by Honda Tsushin Kogyo Co.,LTD (Model No. FRD-SREMTSI – A+). This connector is not available in standard electronics parts catalogs. Additionally this system is designed for, and will be marketed for commercial use only. Only professionals will install the device. In the commercial environments such as retail fueling, technicians have to be trained and licensed to install and this product.

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)).

As the photographs and report indicate, the device was tested in a stand-alone configuration and not inside another device. No special accessories were used during testing of the module.

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.

The modular transmitter will be labeled with its own FCC ID number on the card reader. This label will not be visible when it is installed inside another device, therefore an exterior label is provided with the required text. A separate file in this submission shows labels (with verbiage) as well as their locations on the product.

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.

This module meets the requirements of Section 15.109, 15.209 and 15.225. No special

instructions are required to insure this intentional radiator continues to comply with the FCC rules other than the statement that modifications may not be made to this device “without the written consent of Gilbarco. Unauthorized modifications may void the authority granted under Federal Communications Commission Rules permitting the operation of this device”. This statement is located in the installation manual, which has been sent as part of this grant submittal.

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.

The transmitter complies with all RF exposure requirements. Compliance is detailed in the test report.