



## MODULAR APPROVAL REQUEST

*Date: February 25, 2015*

TRaC Global  
100 Frobisher Business Park  
Leigh Sinton Road  
Malvern  
Worcestershire  
WR14 1BX  
UK

RE: FCC Modular Approval  
FCC ID: NFC-CRDU

To Whom It May Concern:

Please be advised that the manufacturer requests that the above-referenced model be approved for Licensed Modular Approval in accordance with the FCC Rules and Regulations.

**Our Product meet the FCC modular approval policies except V and VI in the following ways, and therefore seeking for a limited modular approval:**

**i** The radio elements must have the radio frequency circuitry shielded. Physical/discrete and tuning capacitors may be located external to the shield, but must be on the module assembly;

**The radio frequency circuit is shielded by the stainless steel shield thickness 0.2 mm.**

**ii** The module must have buffered modulation/data inputs to ensure that the device will comply with Part 15 requirements with any type of input signal;

**DHX91 is based on an ARM926EJ-S™ processor with internal memory, as well as caches enabling code and data to be run from external quad SPI (QSPI) flash, installed on the module (under the same shield).**

**iii** The module must contain power supply regulation on the module;

**CR-DU-MDL is based on "system-on-chip" - DHX91 - which have embedded DC/DC step converter.**

**iv** The module must contain a permanently attached antenna, or contain a unique antennaconnector, and be marketed and operated only with specific antenna(s), per Sections 15.203, 15.204(b), 15.204(c), 15.212(a), 2.929(b);

**Only permanently attached antennas are used.**

**v** The module must demonstrate compliance in a stand-alone configuration;

The CR-DU-MDL module was tested installed on the representative end products (hosts). One of the hosts was used for conducted tests. No difference between hosts in terms of CR-DU-MDL module powering option or signal and data lines connected to/from it. All combinations of the hosts were used for radiated tests. Each host utilize its own, permanently antenna.

**vi** The module must be labelled with its permanently affixed FCC ID label, or use an electronic display (See KDB Publication 997198 about labelling requirements);

The CR-DU-MDL module is not bearing FCC ID number. However it will only be installed by CROW in the same technique as it was done for the testing purposes.

FCC ID and FCC logo are provided on the host's product label attached to each host device where the CR-DU-MDL module is incorporated.

**vii** The module must comply with all specific rules applicable to the transmitter. The grantee must provide comprehensive instructions to explain compliance requirements;

Compliance with all relevant FCC rules is shown in the original test report.

**viii** The module must comply with RF exposure requirements. For any transmitters intended for use in portable devices, SAR compliance must be demonstrated to be independent of the host device. See KDB Publication 447498 Item 2) as a guide to determine if a transmitter can be tested without being limited to a host device. If SAR compliance can only be demonstrated in specific host types or platforms, then the module type must be "limited."

The CR-DU-MDL module is not intended to be used in portable devices. It is comply with the relevant requirements.

Thank you for your attention to this matter.

Yours faithfully

*CROW ELECTRONIC ENGINEERING LTD*

A handwritten signature in black ink, appearing to be 'E. Plotnichenko', written over a horizontal line.

Eugene Plotnichenko,  
Compliance Manager