

Date: 9/2<u>8/2012</u>

Modular approval request

Federal Communications Commission **Equipment Authorization Branch** 7435 Oakland Mills Road Columbia, MD 21046

Gentlemen:

Neptune Technology Group Inc. respectfully requests to have the R450M under FCC ID: P2SR450M approved as a modular solution. The R450M will be used in a variety of devices assembled internally at Neptune Technology Group Inc. The R450M module will not be offered for sale as a standalone module for use in third party products or products assembled by third parties. Therefore, the following cannot be adjusted or modified data transmission, field strength levels and timing requirements. The R450M is a complete radio solution that includes the numbered requirements identified below:

- 1. RF shield to ensure that the module does not have to rely upon the shielding provided by the device,
- 2. built in microcontroller used to process and buffer the data,
- 3. battery to provide an independent voltage reference from the device into which the module is installed,
- 4. "unique" antenna coupler to prevent moisture ingress and prevent unauthorized antenna use.
- 5. tested in a stand-alone configuration to demonstrate the module is capable fo compliance regardless of the device into which it is eventually installed,
- 6. silk screen printed FCC ID number and an external label will be used to provide clear FCC ID visibility,
- 7. all operational and timing requirements are programmed at the factory and cannot be changed upon installing into the end device,
- 8. complies with applicable RF exposure requirements as a stand alone module and is not dependent on specific installation requirements.

Modular approval is requested to afford relief to Neptune Technology Group Inc. by eliminating the requirement that a new equipment authorization be obtained for the same transmitter when it is installed in various devices.

I appreciate your assistance in this matter.

Sincerely,

Name: Jim Brennan Signature: