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Elliott Laboratories Inc. 684 West Maude Avenue 408-245-7800 Phone Sunnyvale, CA 94086-3518 408-245-3499 Fax

May 4, 2006

Elliott TCB 684 West Maude Avenue Sunnvyale, CA 94085

Dear Application Examiner:

Modular approval for the device is being requested.

The device meets the eight requirements outlined in FCC Public Notice DA 00-1407 Released: June 26, 2000.

Netgear is seeking a Limited Modular Approval. The module will be used exclusively by and in Netgear's final products and will not be sold to OEM's or to the general public. Netgear will be responsible for compliance of the module when installed in its final host. Netgear is aware that the module can only be used for mobile applications and cannot be used in "portable" (less than 20 cm separation distance) applications



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1) The modular transmitter must have its own RF shielding. The EUT contains its own RF shielding (refer to external and internal photos)

2) The modular transmitter must have buffered modulation/data inputs. EUT has buffered data inputs to insure compliance with Part 15 requirements under conditions of excessive data rates or over- modulation. Please refer to the schematics.

3) The modular transmitter must have its own power supply regulation.

The EUT has its own power supply regulation to insure compliance with Part 15 requirements regardless of the quality or level of external DC supplying the module from the host unit. Refer to Schematics.

4) The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c).

The module will be installed inside final host and the user will not have access to the antennas.

5) The modular transmitter must be tested in a stand-alone configuration. The EUT was tested outside a system host.

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.

## The devices containing the module will be labeled with the FCC ID of the module.

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.

The operating limitations are fully understood by applicant.

8) The modular transmitter must comply with any applicable RF exposure requirements. The MPE calculation shows that the device meets the RF exposure requirements provided that a separation of at least 20cm is maintained between the EUT and people in its vicinity. The installation and user manuals for products containing this module will all reference this requirement.

9) The final device is designed for mobile or fixed operation (Portable is not permitted – Reference TCB Exclusion List (17 July 2002) II(g)).

The final device will be used for mobile or fixed operation as detailed in the manual. Netgear will use the module only in its products and will not sell to OEM's or to the general public.



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10) The maximum antenna gain to allow compliance with RF exposure requirements is listed on the Grant of Certification for the module

## Maximum antenna gain info and specifications have been uploaded into the RF exposure exhibit for review and record.

11) The licensed module must have a FCC ID label on the module itself. That FCC ID label must be visible through a window on the final device or it must be visible when an access panel, door or cover is easily removed. If not, a second label must be placed on the outside of the final device that contains the following text: "Contains FCC ID: xxxyyyzzz"

## Refer to #6. The applicant is aware that a label will be required outside the final product if the label on the module is not visible when purchased or open.

If there are any questions or if further information is needed, please contact Elliott Laboratories for assistance.

Sincerely,

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Juan Martinez Senior EMC Engineer

JM/dmg