

Date: 5 March, 2015

Ref: LMA Compliance Letter

To: Federal Communications Commission

Subject: LMA compliance letter

This letter introduces AeroScout Ltd's request to expand the modular approval of its EX-3300 Exciter according to FCC Limited Modular Approval procedure, and to demonstrate the means to control the module as required by the LMA procedure.

The EX3300 Exciters are specialty designed to be embedded in Hand Hygiene dispenser. When a dispenser with an embedded EX3300 Exciter is activated, the Exciters trigger AeroScout's tags that are located near the Exciter and the tags in turn transmit a message to AeroScout Location Receivers or compatible Access Points in range. This provides instant acknowledgment that a tagged staff member has used the dispenser. The AeroScout Visibility System can detect, record and report the rate of usage of the dispensers per user and provides a revolutionary way for health care facilities to monitor the hand hygiene policy compliance of staff members.

This model is not sold separately, and is not installed in any host units other than the following:

1) M/N: 92021188

2) M/N: 92021184

3) M/N: 92021121

4) M/N: 1371-04

5) M/N: 1971-04

6) M/N: 2720-12

7) M/N: 2745-12

8) M/N: 2785-12

9) M/N: 2845-12

The manufacturer of these host units has been instructed not to use insert the EX-3300 Exciter into any other host unit other than the host units mentioned previously. This instruction appears on page 25 of the user manual.

In any case where the EX-3300 Exciter will be added to other hosts in the future, AeroScout Ltd. will expand the LMA to include the new hosts.

The module incorporates an integral antenna its EIRP does not change between the hosts other than changes created by the host units shape influence.

Due to all the above mentioned, AeroScout Ltd feels that the testing conducted by ITL to the various hosts, with the fact that AeroScout Ltd. markets the EX-3300 Exciter for use only in the hosts submitted in this application and the host manufacturer has been instructed (in the user manual) not to insert the EX-3300 Exciter in any host not included in this application, assure complete compliance with FCC LMA procedure.

As per § 15.212 Modular transmitters:

Single modular transmitters must meet the following requirements to obtain a modular transmitter approval.

Requirement	Not Maintained	Maintained
(1) The radio elements of the modular	Not maintained	
transmitter must have their own		
shielding. The physical crystal and		
tuning capacitors may be located		
external to the shielded radio		
elements.		
(2) The modular transmitter must have		Yes
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.		
(3) The modular transmitter must have		Yes
its own power supply regulation.		(battery powered)
(4) The modular transmitter must		
comply with the antenna and		Yes
transmission system requirements of		(Internal antenna)
§§15.203, 15.204(b) 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).		
" C · · · · · · · · · · · · · · · · · ·		
The "professional installation"		
provision of §15.203 is not applicable		
to modules but can apply to limited		
modular approvals under paragraph (b)		
of this section.		

As per § 15.212 Modular transmitters:

Single modular transmitters must meet the following requirements to obtain a modular transmitter approval.

Requirement	Not Maintained	Maintained
(5) The modular transmitter must be	Module was tested in the	
tested in a stand-alone configuration,	host configurations	
i.e., the module must not be inside		
another device during testing for		
compliance with part 15 requirements.		
Unless the transmitter module will be		
battery powered, it must comply with		
the AC line conducted requirements		
found in §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 §15.27(a)). The		
length of these lines shall be the 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 and commercially		
available (see §15.31(i)).		
(6) The modular transmitter must be		Yes
equipped with either a permanently		
affixed label or must be capable of		
electronically displaying its FCC		
identification number.		
(7) The modular transmitter must		Yes
comply with any specific rules or		
operating requirements that ordinarily		
apply to a complete 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.		
(8) The modular transmitter must		Yes
comply with any applicable RF		
exposure requirements in its final		
configuration.		

Thank you,

Reuven Amsalem

VP HW R&D AeroScout Ltd.