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Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
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2023-05-16

Subject: **Limited Modular Approval Letter, FCC ID: QCI-PQXMOD1**

Dear Application Examiner:

SMART Technologies Inc. is seeking limited modular approval for SMART PQX Pen BLE radio module **Model: PQXMOD1, FCC ID: QCI-PQXMOD1**. The radio meets the requirements for limited modular approval as detailed in FCC 15.212(b).

Compliance to each of the requirements is described below:

- 1. “The modular transmitter must have its own RF shielding.”** – Non-compliant; the radio portion of the module is not contained in its own RF shielding. Please see the Internal Photos exhibit.
- 2. “The modular transmitter must have buffered modulation/data inputs.”** The EUT has buffered data inputs to ensure compliance with Part 15 requirements under conditions of excessive data rates or over-modulation. Please see the Schematics exhibit.
- 3. “The modular transmitter must have its own power supply regulation.”** The EUT has its own power supply regulation to ensure compliance with Part 15 requirements regardless of the quality or level of external DC supplying the module from the host unit. Please see the Schematics exhibit. The module is intended for use within a battery powered host product, so AC power line conducted emissions testing was not applicable.
- 4. “The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c).”** The EUT meets the FCC antenna requirements. Please see the Antenna information exhibit and internal photos exhibit.
- 5. “The modular transmitter must be tested in a stand-alone configuration.”** The EUT was tested in a stand-alone configuration. The module was greater than 10 cm from the host device. Please see the test setup photos exhibit and technical report exhibit.
- 6. “The modular transmitter must be labeled with its own FCC ID number.”** The EUT is intended to be installed inside SMART Pen Model: PQX-1, a handheld accessory device used in conjunction with SMART QX Series Interactive Flat Panel (IFP) display models: IDQX65-1, IDQX75-1, IDQX86-1. Each SMART QX Series IFP model will utilize e-labeling to display the SMART PQX Pen BLE radio module FCC ID as contained within the host model: PQX-1. Additionally, the FCC ID will be applied in user documentation that ships with the PQX-1 pen and product packaging. Please see FCC ID label & location exhibit.

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.” The EUT is compliant with all applicable FCC rules. Detailed instructions for maintaining compliance are given in the User Manual.

8. “The modular transmitter must comply with any applicable RF exposure requirements.” The EUT is compliant with all applicable RF exposure requirements. Please see the RF Exposure Exhibit.

Please contact me if you have additional questions. Your attention to this matter is greatly appreciated.

Sean MacKellar

Sean MacKellar / Sr. Regulatory Specialist
SMART Technologies Inc.