



Federal Communications Commission
P.O. Box 429
Columbia, MD 21045

Date: October 08, 2013

RE: Application for Limited Modular Approval Certification for the OpenWay 3.1 module

Dear Sir or Madam:

The following information addresses the requirements to support a limited modular approval as required by FCC Part 15.212, Modular Transmitters.

1. The frequency hopping spread spectrum transmitter section is not shielded. Testing has been performed to assure compliance.
2. The OpenWay 3.1 does not have external modulation or data inputs. The RF section is driven by an on board MCU which controls RF data lines and does not allow excessive modulation.
3. The modular transmitter has its own power regulation. The module will be integrated into a meter host which also offers power regulation.
4. The frequency hopping spread spectrum transmitter has an antenna connected and permanently mounted under glass in the host meter.
5. The OpenWay 3.1 module was tested within a host meter. This module will always be integrated internal to a meter host.
6. The OpenWay 3.1 register module will be labeled as required. The meter host will also have the required labeling.
7. Operating requirements are included in the host technical manual.
8. MPE measurements are provided to demonstrate RF compliance. There is a cautionary statement that is included in the technical manual stipulating the 20 cm separation distance.

All meter forms which act as hosts to the OpenWay 3.1 module will be tested with the OpenWay 3.1 module for compliance and documented through the permissive change process.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mike Mathis", is written over a horizontal line.

Name: Mike Mathis

Signature:

Title: Regulatory Engineer

Date: October 08, 2013