



LIMITED MODULAR APPROVAL EXHIBIT, M6e FCCID: QV5MERCURY6E-A

§ 15.212 Modular transmitters.

(a) Single modular transmitters consist of a completely self-contained radio frequency transmitter device that is typically incorporated into another product, host or device. Split modular transmitters consist of two components: a radio front end with antenna (or radio devices) and a transmitter control element (or specific hardware on which the software that controls the radio operation resides). All single or split modular transmitters are approved with an antenna. All of the following requirements apply, except as provided in paragraph (b) of this section.

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

(i) The radio elements of the modular transmitter must have their own shielding. The physical crystal and tuning capacitors may be located external to the shielded radio elements.

ThingMagic, a division of Trimble Navigation Ltd (“ThingMagic”) asserts the radio elements of the modular transmitter on the M6e have their own shielding.

(ii) The modular transmitter must have 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.

ThingMagic asserts the transmitter has buffered modulation / data inputs.

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

ThingMagic asserts the modular transmitter has it’s own power supply regulation

(iv) The modular transmitter must comply with the antenna and transmission system requirements of §§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). 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.

ThingMagic asserts the modular transmitter employs a unique antenna connector and complies with the antenna and transmission system requirements of 15.203, 15.204 (b) and 15.204 © Professional installation is required for this module to ensure compliance of power settings with the selected cable assembly.

(v) The modular transmitter must be tested in a stand-alone configuration, *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)).

ThingMagic asserts the module was tested in stand alone configuration. All peripherals used during testing are commercially available.

(vi) The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying its FCC identification number.

ThingMagic asserts the module will be equipped with a permanently affixed label.

(A) If using a permanently affixed label, the modular transmitter must be labeled with its own FCC identification number, and, if the FCC identification number 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. This exterior label can use wording such as the following: “Contains Transmitter Module FCC ID: XYZMODEL1” or “Contains FCC ID: XYZMODEL1.” Any similar wording that expresses the same meaning may be used. The Grantee may either provide such a label, an example of which must be included in the application for equipment authorization, or, must provide adequate instructions along with the module which explain this requirement. In the latter case, a copy of these instructions must be included in the application for equipment authorization.

ThingMagic asserts the modular transmitter will be labeled with it’s own FCC ID and if the module is integrated into a product and the FCC ID is not visible that product will display a label referring to the enclosed module.

(B) If the modular transmitter uses an electronic display of the FCC identification number, the information must be readily accessible and visible on the modular transmitter or on the device in which it is installed. If the module is installed inside another device, then the outside of the device into which the module is installed must display a label referring to the enclosed module. This exterior label can use wording such as the following: “Contains FCC certified transmitter module(s).” Any similar wording that expresses the same meaning may be used. The user manual must include instructions on how to access the electronic display. A copy of these instructions must be included in the application for equipment authorization.

The modular transmitter does not use an electronic display of its FCC identification number.

(vii) The modular transmitter must 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.

ThingMagic asserts the modular transmitter will comply with any specific rules or operating requirements that ordinarily apply to a complete transmitter and will provide adequate

instructions along with the module to explain these requirements.

(viii) The modular transmitter must comply with any applicable RF exposure requirements in its final configuration.

ThingMagic asserts the modular transmitter will comply with any applicable RF exposure requirements in its final configuration.

(2) Split modular transmitters must meet the requirements in paragraph (a)(1) of this section, excluding paragraphs (a)(1)(i) and (a)(1)(v), and the following additional requirements to obtain a modular transmitter approval.

(i) Only the radio front end must be shielded. The physical crystal and tuning capacitors may be located external to the shielded radio elements. The interface between the split sections of the modular system must be digital with a minimum signaling amplitude of 150 mV peak-to-peak.

(ii) Control information and other data may be exchanged between the transmitter control elements and radio front end.

(iii) The sections of a split modular transmitter must be tested installed in a host device(s) similar to that which is representative of the platform(s) intended for use.

(iv) Manufacturers must ensure that only transmitter control elements and radio front end components that have been approved together are capable of operating together. The transmitter module must not operate unless it has verified that the installed transmitter control elements and radio front end have been authorized together. Manufacturers may use means including, but not limited to, coding in hardware and electronic signatures in software to meet these requirements, and must describe the methods in their application for equipment authorization.

ThingMagic asserts this product is not a split transmitter

(b) A limited modular approval may be granted for single or split modular transmitters that do not comply with all of the above requirements, *e.g.*, shielding, minimum signaling amplitude, buffered modulation/data inputs, or power supply regulation, if the manufacturer can demonstrate by alternative means in the application for equipment authorization that the modular transmitter meets all the applicable part 15 requirements under the operating conditions in which the transmitter will be used. Limited modular approval also may be granted in those instances where compliance with RF exposure rules is demonstrated only for particular product configurations. The applicant for certification must state how control of the end product into which the module will be installed will be maintained such that full compliance of the end product is always ensured.

This application is for limited modular approval (LMA) and ThingMagic will require the OEM who will use this module (subject to the rules and regulations of the FCC) to sign an agreement with ThingMagic that will require the OEM to use a professional installer for the product to ensure the correct power settings of the product are applied (as specified in the user manual) so that the output power at the end of the cable does not exceed 30dBm.

Sincerely,

Bernd Schoner

Bernd Schoner
ThingMagic

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