

Please apply the following format, including the headline, to your user manual and fill each section according to the requirements mentioned in pages 2-4. If a particular section does not apply to your device, please do not remove this section. Instead, keep the header and insert 'not applicable'. In addition to that, please enter a short explanation, why this section does not apply to your device.

## **Integration instructions for host product manufacturers according to KDB 996369 D03 OEM Manual v01**

### **2.2 List of applicable FCC / ISED rules**

<b>FCC:</b>	<b>ISED:</b>
47 CFR Part 15 Subpart C §15.247	RSS-247, Issue 2, February 2017

### **2.3 Specific operational use conditions**

Same modes as CT300.

### **2.4 Limited module procedures**

N/A, because it's proprietary radio module for our products only, not for sale to third parties.

### **2.5 Trace antenna designs**

N/A, because it's not a trace antenna design.

### **2.6 RF exposure considerations**

RF exposure requirements are fulfilled for mobile configuration. The installation of the module is restricted to mobile host devices what is clearly stated in the installation instruction of the user manual.

### **2.7 Antennas**

The CT301 (SMT Antenna, Model No. of antenna: 2450AT45A100) confirms to the FCC recommendations for internal antenna type. The mounting of the antenna is fixed to the radio module and no other antenna should be used.

### **2.8 Label and compliance information**

The module has its own label. The instruction for labelling rules for the host device has been stated in the user manual.

### **2.9 Information on test modes and additional testing requirements**

it is a proprietary antenna for our products only. The integration into the host devices is stated in the installation instructions. The host devices are separately certified on host device level considering the available module certification to ensure compliance with FCC.

### **2.10 Additional testing, Part 15 Subpart B disclaimer**

N/A, because it's proprietary radio module, not for sale to third parties.

## **General**

Sections 2.2 through 2.10 of KDB 996369 D03 describe the items that must be provided in the integration instructions for host product manufacturers (e.g., OEM instruction manual) to use when integrating a module in a host product. Modular transmitter applicants should include information in their instructions for all these items indicating clearly when they are not applicable. For example, information on trace antenna designs could indicate “not applicable.”

If the modular transmitter is only approved for use by the grantee in its own products and not intended for sale to third parties, the integration instructions may not be detailed but this must be declared in the filing. In that case, it is permitted to place the instructions in the theory-of-operation exhibit folder using long-term confidentiality. The applicant must include a statement in the filing that the module is not for sale and the user manual integration instructions are internal confidential manufacturing documents. The grant of certification for such a modular transmitter must be limited.

### **2.2 List of applicable FCC rules**

List the FCC rules that are applicable to the modular transmitter. These are the rules that specifically establish the bands of operation, the power, spurious emissions, and operating fundamental frequencies. DO NOT list compliance to unintentional-radiator rules (Part 15 Subpart B) since that is not a condition of a module grant that is extended to a host manufacturer. See also Section 2.10 below concerning the need to notify host manufacturers that further testing is required.

### **2.3 Summarize the specific operational use conditions**

Describe use conditions that are applicable to the modular transmitter, including for example any limits on antennas, etc. For example, if point-to-point antennas are used that require reduction in power or compensation for cable loss, then this information must be in the instructions. If the use condition limitations extend to professional users, then instructions must state that this information also extends to the host manufacturer’s instruction manual. In addition, certain information may also be needed, such as peak gain per frequency band and minimum gain, specifically for master devices in 5 GHz DFS bands.

### **2.4 Limited module procedures**

If a modular transmitter is approved as a “limited module,” then the module manufacturer is responsible for approving the host environment that the limited module is used with. The manufacturer of a limited module must describe, both in the filing and in the installation instructions, the alternative means that the limited module manufacturer uses to verify that the host meets the necessary requirements to satisfy the module limiting conditions.

A limited module manufacturer has the flexibility to define its alternative method to address the conditions that limit the initial approval, such as: shielding, minimum signaling amplitude, buffered modulation/data inputs, or power supply regulation. The alternative method could include that the limited module manufacturer reviews detailed test data or host designs prior to giving the host manufacturer approval.

This limited module procedure is also applicable for RF exposure evaluation when it is necessary to demonstrate compliance in a specific host. The module manufacturer must state how control of the product into which the modular transmitter will be installed will be maintained such that full compliance of the product is always ensured. For additional hosts other than the specific host originally granted with a limited module, a Class II permissive change is required on the module grant to register the additional host as a specific host also approved with the module.

## **2.5 Trace antenna designs**

For a modular transmitter with trace antenna designs, see the guidance in Question 11 of KDB Publication 996369 D02 FAQ – Modules for Micro-Strip Antennas and traces. The integration information shall include for the TCB review the integration instructions for the following aspects: layout of trace design, parts list (BOM), antenna, connectors, and isolation requirements.

- a) Information that includes permitted variances (e.g., trace boundary limits, thickness, length, width, shape(s), dielectric constant, and impedance as applicable for each type of antenna);
- b) Each design shall be considered a different type (e.g., antenna length in multiple(s) of frequency, the wavelength, and antenna shape (traces in phase) can affect antenna gain and must be considered);
- c) The parameters shall be provided in a manner permitting host manufacturers to design the printed circuit (PC) board layout;
- d) Appropriate parts by manufacturer and specifications;
- e) Test procedures for design verification; and
- f) Production test procedures for ensuring compliance.

The module grantee shall provide a notice that any deviation(s) from the defined parameters of the antenna trace, as described by the instructions, require that the host product manufacturer must notify the module grantee that they wish to change the antenna trace design. In this case, a Class II permissive change application is required to be filed by the grantee, or the host manufacturer can take responsibility through the change in FCC ID (new application) procedure followed by a Class II permissive change application.

## **2.6 RF exposure considerations**

It is essential for module grantees to clearly and explicitly state the RF exposure conditions that permit a host product manufacturer to use the module. Two types of instructions are required for RF exposure information: (1) to the host product manufacturer, to define the application conditions (mobile, portable – xx cm from a person's body); and (2) additional text needed for the host product manufacturer to provide to end users in their end-product manuals. If RF exposure statements and use conditions are not provided, then the host product manufacturer is required to take responsibility of the module through a change in FCC ID (new application).

## **2.7 Antennas**

A list of antennas included in the application for certification must be provided in the instructions. For modular transmitters approved as limited modules, all applicable professional installer instructions must be included as part of the information to the host product manufacturer. The antenna list shall also identify the antenna types (monopole, PIFA, dipole, etc. (note that for example an "omni-directional antenna" is not considered to be a specific "antenna type")).

For situations where the host product manufacturer is responsible for an external connector, for example with an RF pin and antenna trace design, the integration instructions shall inform the installer that unique antenna connector must be used on the Part 15 authorized transmitters used in the host product. The module manufacturers shall provide a list of acceptable unique connectors.

## **2.8 Label and compliance information**

Grantees are responsible for the continued compliance of their modules to the FCC rules. This includes advising host product manufacturers that they need to provide a physical or e-label stating "Contains FCC ID" with their finished product. See Guidelines for Labeling and User Information for RF Devices – KDB Publication 784748.

## **2.9 Information on test modes and additional testing requirements**

Additional guidance for testing host products is given in KDB Publication 996369 D04 Module Integration Guide. Test modes should take into consideration different operational conditions for a stand-alone modular transmitter in a host, as well as for multiple simultaneously transmitting modules or other transmitters in a host product.

The grantee should provide information on how to configure test modes for host product evaluation for different operational conditions for a stand-alone modular transmitter in a host, versus with multiple, simultaneously transmitting modules or other transmitters in a host.

Grantees can increase the utility of their modular transmitters by providing special means, modes, or instructions that simulates or characterizes a connection by enabling a transmitter. This can greatly simplify a host manufacturer's determination that a module as installed in a host complies with FCC requirements.

## **2.10 Additional testing, Part 15 Subpart B disclaimer**

The grantee should include a statement that the modular transmitter is **only** FCC authorized for the specific rule parts (i.e., FCC transmitter rules) listed on the grant, and that the host product manufacturer is responsible for compliance to any other FCC rules that apply to the host not covered by the modular transmitter grant of certification. If the grantee markets their product as being Part 15 Subpart B compliant (when it also contains unintentional-radiator digital circuitry), then the grantee shall provide a notice stating that the final host product still requires Part 15 Subpart B compliance testing with the modular transmitter installed.