

Dec 23, 2019

Dear FCC Examiner,

We are applying for FCC certification of our Ankle Worn Electronic Tracking Device with FCC ID: S5EBTV81018;

The Device is based on the following pre-certified radio modules,

- Murata WiFi/Bluetooth with FCC ID VPYLB1LD, single modular approval, grant issued 05/26/2017,
- Telit WCDMA and LTE cellular wireless module with FCC ID RI7LEg10CXNF, single modular approval, grant issued 10/18/2018

And is in addition equipped with a LoRa 915 MHz radio.

Based on FCC KDB 996369 D02 Module Q&A 1 and due to documented equality of the WiFi/Bluetooth and the cellular radio portions we claim validity of all test results from the following test reports as filed for the initial approval

Filed under FCC ID: VPYLB1LD:

#17040026JMA-001, rev. 5/2/2017, of Intertek Japan K.K.

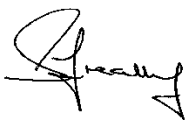
Filed under FCC ID: RI7LEg10CXNF:

#1870209R-HPUSP17V00-A, 8/23/2018, of DEKRA Testing and Certification Co., Ltd...

We confirm that the above listed pre-certified radio modules are integrated strictly according to the respective integration manuals and according grant conditions, and thus, that the leveraged test results from the above listed reports are representative for the same radios being part of our end-product.

Radiated spurious emissions and output power testing has been applied for verification of continued compliance, as documented in the relevant EMC and SAR reports filed with this application.

Since our end-product will be used in ankle worn position SAR testing has been applied as documented in the SAR report filed with this application.



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