



August 21, 2013

Nemko Canada Inc.
303 River Road
Ottawa, Ontario, Canada
K1V 1H2

Attn: Director of Certification

The subject device contains a previously certified cellular modem module. The 13.56 MHz transmitter in the device is programmed to not transmit simultaneously with the cellular modem module. Therefore, there are no colocation issues and no simultaneous transmission tests required. In addition, the 13.56 MHz transmitter is categorically excluded from evaluation for RF exposure.

While the cellular module is certified as a mobile device, the module is installed in a parking meter at a fixed location. The FCC's rules direct the applicant to take into account the intended use and installation of the device in "determining minimum distances for [SAR or MPE] compliance." (*See* 47 C.F.R. §2.1091(d)(4)).

For a radio module enclosed in a parking meter, the public is generally not expected to come into direct contact with, or within 20 cm from, the radiating structure of the radio while it is transmitting. To interact with the meter, only the user's hand approaches the meter to insert coins or a credit card and operate the touch pad or screen. During the interaction, the cellular radio is in battery conservation mode and is generally not transmitting. When the user completes the transaction and removes his or her hand from the meter, the user would normally be more than 20 cm from the radio antenna located inside the rear of the meter. When the cellular radio transmits the credit card information, the transmissions are of a short duration (typically 5 to 10 seconds). The cellular radio infrequently transmits at other times (e.g., during a fault condition) when it is unlikely that a user would remain located in close proximity to a parking meter for any extended duration. Accordingly, the 20 cm separation distance is not required to protect the public against harmful radiation from the cellular radio module, which is infrequently used when the user is normally located more than 20 cm away and is located inside a metal parking meter.

Sincerely,

Alexander Schwarz

C.T.O.