



Modular Approval Request Attestation

June 10, 2011

Federal Communications Commission
Office of Engineering and Technology
Equipment Authorization Division
7345 Oakland Mills Road
Columbia, MD 21046

Re: FCC Form 731 Application for Equipment Certification and Request for Approval as a
Limited Modular Transmitter
FCC ID: SM6-MINODE-CIH

Dear Application Examiner,

Mueller Systems, LLC ("Mueller Systems"), respectfully requests certification of the above referenced equipment, ("Poly-Phase") as a limited modular device. Together with the information contained in the accompanying FCC Form 731, Application for Certification, Mueller Systems hereby attests that the equipment complies with the modular approval requirements of Section 15.212 of the Commission's Rules as follows:

1. "The radio elements of the modular transmitter must have its own shielding."
 - The radio portion of this module has been shielded; please see attached Exhibit 1, Poly-Phase top with full shield .
2. "The modular transmitter must have buffered modulation/data inputs."
 - The Poly-Phase contains buffered data inputs; it is integrated in an Atmel Atmega128 device.
3. "The modular transmitter must have its own power supply regulation."
 - The Poly-Phase contains its own power supply and regulation.
4. "The modular transmitter must comply with the antenna and transmission requirements of section 15.203, 15.204(b) and 15.204(c)."
 - The Poly-Phase meets the FCC antenna and transmission requirements. For a summary of the transmission characteristics please see Exhibit 4, MUE 11958 FCC-IC MiNODE (PolyPhase) part15 247 test report in Table 1 Device Summary on page 3 of 60.
The antenna for the Poly-Phase module is attached via an industry standard MMCX connector. The module will only be sold installed within Mueller Systems equipment with the antenna installed by factory trained personnel. The antenna is located within the end equipments enclosure and cannot be accessed by the user.
5. "The modular transmitter must be tested in a stand-alone configuration."

- The Poly-Phase was tested in a stand-alone configuration via a serial interface. Please see Exhibit 5, MUE11985 Test Setup Photos.
6. “The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying FCC identification number.”
- The Poly-Phase will have a permanently affixed label bearing the FCC ID: SM6-MINODE-CIH.
Please see attached Exhibit 7, 130-0019-001_B00 MiNode_CIH bd FCC label for the label affixed to the module and Exhibit 8, 130-0020-001_B00 smartmeter_CIH FCC ID label for the label permanently affixed to any product containing the Poly-Phase module.
7. “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.”
- The Poly-Phase is compliant with all applicable FCC rules. Detailed instructions for maintaining compliance is given in the attached Exhibit 9, 880-0042-001_CI Install Manual Rv2.
8. “The modular transmitter must comply with any applicable RF Exposure requirements.”
- The Poly phase is compliant with all applicable RF Exposure requirements. RF Exposure is addressed in the Washington Labs Test Report Exhibit 6, MUE11958 FCC MPE Report.

Thank you for your attention to this matter.

Sincerely,



Clayton Robert Barker III
Executive Vice President & General Counsel