



Modular Request Attestation

March 1, 2011

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

RE: Certification Application and Request for
Approval as a Modular Transmitter
FCC ID: SM6-MINODE-WATER3

Dear Application Examiner:

Mueller Systems, LLC ("Mueller Systems"), respectfully requests certification of the above referenced equipment, ("MiNode-Water3") as a 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, DCOM3 top with shield.
2. "The modular transmitter must have buffered modulation/data inputs."
 - The Mi.Node – Water3 contains buffered data inputs; it is integrated in an Atmel xmeag128 device.
3. "The modular transmitter must have its own power supply regulation."
 - The Mi.Node – Water3 is powered from a lithium battery permanently wired to the radio.
4. "The modular transmitter must comply with the antenna and transmission requirements of section 15.203, 15.204(b) and 15.204(b)."
 - The Mi.Node – Water3 meets the FCC antenna requirements. The spurious emission, unique permanently connected antenna is shown in the exhibits to the application submitted by Washington Labs. For a photograph of the antenna, please see attached Exhibit 2, DCOM3 bottom with antenna.

5. "The modular transmitter must be tested in a stand-alone configuration."
 - The Mi.Node – Water3 was tested in a stand-alone configuration via a serial interface. Please see exhibit labeled "Test Setup Photos" in Washington Labs Test Report.

6. "The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying FCC identification number."
 - The Mi-Node - Water3 will have a permanently affixed label bearing the FCC ID: SM6 – MINODE - WATER3. Please see attached Exhibit 3, FCC Label, for the FCC ID of this 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 Mi.Node – Water3 is compliant with all applicable FCC rules. Detailed instructions for maintaining compliance are given in the attached Exhibit 4, Installation Manual.

8. "The modular transmitter must comply with any applicable RF exposure requirements."
 - The Mi.Node – Water3 is compliant with all applicable RF exposure requirements. RF Exposure is addressed in the Washington Labs Test Report exhibit "MPE Data".

Thank you for your attention to this matter.

Sincerely,



Clayton Robert Barker III

Executive Vice President and General Counsel