



13 February 2009

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

RE: Modular Request Attestation
FCC ID: SM6-UGM-L-NS

Dear Application Examiner,

ArKion Systems UGM-L, FCC ID: SM6-UGM-L-NS, would like to have your authorization as a limited modular approval. The requirements of FCC part 15.212 have been met and shown on the following statements. This module has been tested in two different electric meter form; 2S + 12S (hosts). We acknowledge that prior to putting in any other host(s) we would need to complete radiated emissions testing in the restricted bands as a permissive change.

1. "The modular transmitter must have its own RF shielding." The radio portion of the UGM-L module has been not been shielded, the testing demonstrates shielding in the controlled configurations is not required.
2. "The modular transmitter must have buffered modulation/data inputs." The UGM-L contains buffered data inputs; it is integrated in SN74LV07ADGVR
3. "The modular transmitter must have its own power supply regulation." The UGM-L contains a regulator in the DC input port, MAX1776.
4. "The modular transmitter must comply with the antenna requirements of section 15.203 and 15.204(C)." The UGM-L meets the FCC antenna requirements. The spurious emission, unique antenna connector and photo of antennas are shown in the application exhibits.
5. "The modular transmitter must be tested in a stand-alone configuration" The UGM-L was integrated into the two different electric meter forms (hosts). Please see exhibit "Test Setup Photos".
6. "The modular transmitter must be labeled with its own FCC ID number." Please see exhibit "FCC Label" for the FCC ID of this module.
7. "The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter and the manufacturer must provide adequate instructions along with the module to explain any such requirements." The UGM-L is compliant with all applicable FCC rules. Detail instructions for maintaining compliance are given in the Users Manual.

8. "The modular transmitter must comply with any applicable RF exposure requirements." The EUT is compliant with all applicable RF exposure requirements. RF Exposure is addressed in the exhibit "MPE Data". Please contact me if you have any further questions.

Thank you for your attention.

Sincerely,

A handwritten signature in black ink that reads "Thomas Cull". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Thomas Cullinan
Vice President, Engineering & Operations