

To: FCC

Federal Communication Commission

From: VideoComm Technologies

Feb. 29, 2008

Re: Request for limited modular approval

VideoComm Technologies of Oakville Ontario Canada are requesting FCC approval for their device "MSR RADIO MODULE" as a limited modular transmitter. The requirements of FCC Public Notice DA 00-1407 are met as follows:

1) The modular transmitter must have its own RF shielding.

The MSR RADIO has all RF circuitry shielded. (See exhibit photos)

2) The modular transmitter must have buffered modulation data/inputs.

The MSR RADIO has buffered modulation/data inputs.

3) The modular transmitter must have its own power supply regulation

The MSR RADIO MODULE has its own power supply regulation.

4) The modular transmitter must comply with section 15.203 and 15.204(c)

The MSR RADIO MODULE will be sold ONLY as part of a system made by VideoComm. As a module it complies with the antenna requirements.

5) The modular transmitter must be tested in a stand-alone configuration.

The MSR RADIO MODULE was tested in a stand alone configuration

6) The modular transmitter must comply with the AC line conducted requirements found in Section 15.207.

The MSR RADIO MODULE complies with AC LINE conducted requirements.

7) The modular transmitter must be labeled with its own FCC ID number.

The MODULE will have the FCC ID affixed to it and the SYSTEM will also be labeled to indicate that "DEVICE CONTAINS MODULE with FCCID#" (see attached exhibits for diagrams and sample labels)

8) The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter and the manufacturer must provide adequate instructions with the module to explain any such requirements.

The MSR RADIO MODULE complies with all applicable FCC Detailed instructions are given in the "Installation Guide" (see included exhibits)

9) The modular transmitter must comply with any applicable RF exposure requirements.

The maximum measured power output is 801.68 mW (29.04 dBm), the maximum antenna gain is 32 dBi (highest gain antenna of all families tested) (see also FCC test report)

The maximum permissible exposure is defined in 47 CFR 1.1310 with 1 mW/cm². The distance from the EUT's transmitting antenna where the exposure level reaches the maximum permitted level is calculated using the general equation:

$$r = \sqrt{\frac{P \cdot G}{4 \cdot \pi \cdot S}} = \sqrt{\frac{EIRP}{4 \cdot \pi \cdot S}}$$
 (S_{Limit}) = 1.0 mW/cm²

The tables below represent all of the system antennas. Those in "purple" were TCB tested. And the safe installation distances calculated

It must be noted that these systems are manufactured, distributed and sold with the intention of Professional Installation of the final system.

| OUTDOOR ALL WEATHER SYSTEMS ALL INSTALLED AS FIXED POINT TO POINT ONLY | | | | | | |
|--|---------------------|------------|-----------------|--------------------------|--|--|
| Rubber Duck Family 5.8 GHz | | | | | | |
| SYSTEM MODEL | AMPLIFIER | PEAK POWER | ANTENNA GAIN | SEPARATION DISTANCE | | |
| RT-L1R5803 | NO | 26.59 dBm | 3dBi Ducky | 20cm (7.9 Inches) | | |
| RT-X1R5803 | YES | 29.04 dBm | 3dBi Ducky | 20cm (7.9 Inches) | | |
| Antennas Tested By TCB | | | | | | |
| Panel Antenna Family 5.8 GHz | | | | | | |
| SYSTEM MODEL | AMPLIFIER | PEAK POWER | ANTENNA GAIN | SEPARATION DISTANCE | | |
| RT-L1R5807 | NO | 26.59 dBm | 7dBi Embedded | 20cm (7.9 Inches) | | |
| RT-X1R5807 | YES | 29.04 dBm | 7dBi Embedded | 20cm (7.9 Inches) | | |
| RT-L1R5814 | NO | 26.59 dBm | 14dBi Embedded | 30.19 cm (11.9 Inches) | | |
| RT-X1R5814 | YES | 29.04 dBm | 14 dBi Embedded | 40.03 cm (15.8 Inches) | | |
| RT-L1R5821 | NO | 26.59 dBm | 21 dBi External | 67.59 cm (26.6 Inches) | | |
| RT-X1R5821 | YES | 29.04 dBm | 21dBi Embedded | 89.62 cm (35.3 Inches) | | |
| Antennas Tested B | y TCB | | | | | |
| Parabolic Antenna | Family 5.8 GHz | | | | | |
| SYSTEM MODEL | AMPLIFIER | PEAK POWER | ANTENNA GAIN | SEPARATION DISTANCE | | |
| RT-L1R5829 | NO | 26.59 dBm | 29 dBi | 169.79 cm (66.8 Inches) | | |
| RT-X1R5829 | YES | 29.04 dBm | 29 dBi | 225.11 cm (88.6 Inches) | | |
| RT-L1R5832 | NO | 26.59 dBm | 32 dBi | 239.83 cm (94.4 Inches) | | |
| RT-X1R5832 | YES | 29.04 dBm | 32 dBi | 317.98 cm (125.2 Inches) | | |
| Antennas Tested B | y TCB | | | | | |
| Rubber Duck ANT | ENNA FAMILY 2.4 GHZ | | | | | |
| SYSTEM MODEL | AMPLIFIER | PEAK POWER | ANTENNA GAIN | SEPARATION DISTANCE | | |
| RT-L2R2403 | NO | 26.80 dBm | 3dBi Ducky | 20cm (7.9 Inches) | | |
| | | | | | | |
| PANEL ANTENNA FAMILY 2.4 GHZ | | | | | | |
| SYSTEM MODEL | AMPLIFIER | PEAK POWER | ANTENNA GAIN | SEPARATION DISTANCE | | |
| RT-WR2L245 | NO | 26.80 dBm | 15 dBi | 34.71 cm (13.7 Inches) | | |
| Antennas Tested By TCB | | | | | | |

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| INDOOR DESKTOP SYSTEMS | | | | | | | |
|--|---|-----------|------------|----------------------|---------------------|--|--|
| INDOOR DESKTOP SYSTEMS 5.8 GHz MOBILE APPLICATIONS POINT TO POINT ONLY | | | | | | | |
| SYSTEM | RPS | AMPLIFIER | PEAK POWER | ANTENNA GAIN | SEPARATION DISTANCE | | |
| MODEL | | | | | | | |
| XRT-L1R583 | YES | NO | 26.59 dBm | 3dBi Ducky | 20cm (7.9 Inches) | | |
| XRT-L1R588 | YES | NO | 26.59 dBm | 8 dBi Magnetic panel | 20cm (7.9 Inches) | | |
| XRT-X1R583 | YES | YES | 29.04 dBm | 3dBi Ducky | 20cm (7.9 Inches) | | |
| INDOOR DESI | INDOOR DESKTOP FAMILY 2.4 GHZ MOBILE APPLICATIONS POINT TO POINT ONLY | | | | | | |
| SYSTEM | RPS | AMPLIFIER | PEAK POWER | ANTENNA GAIN | SEPARATION | | |
| MODEL | | | | | DISTANCE | | |
| XRT-L2R243 | YES | NO | 26.80 dBm | 3 dBi Ducky | 20cm (7.9 Inches) | | |
| XRT-L2R248 | YES | NO | 26.80 dBm | 8 dBi Magnetic panel | 20cm (7.9 Inches) | | |
| | (RPS= Reverse polarity SMA Connector) | | | | | | |

5.8GHz Antenna Description & Manufacturer

| | VCT Model # | Supplier Part # | Manufacturer | Type | Frequency | Gain |
|---|----------------|-----------------|----------------|----------------|-----------|-------|
| | RUB-5803 | GX5800X03J/w205 | Wellhope Comm. | Ducky | 5.8GHz | 3dBi |
| - | RUB-5803rps | GX5820Z15J/w281 | Wellhope Comm. | Ducky | 5.8GHz | 3dBi |
| | ANT-5807ip | Not Applicable | VideoComm | Internal Patch | 5.8GHz | 7dBi |
| - | ANT-5808ip-RPS | Not Applicable | VideoComm | External Patch | 5.8GHz | 8dBi |
| | ANT-5814ip | Not Applicable | VideoComm | Internal Patch | 5.8GHz | 14dBi |
| | ANT-5821dp | Not Applicable | VideoComm | External Patch | 5.8GHz | 21dBi |
| | ANT-5821ip | Not Applicable | VideoComm | Internal Patch | 5.8GHz | 21dBi |
| | PARA-5829 | G5800P29A60 | Guanhua Comm. | Parabolic Dish | 5.8GHz | 29dBi |
| | PARA-5832 | G5800P32A60 | Guanhua Comm. | Parabolic Dish | 5.8GHz | 32dBi |

Legend:

← RPS = Reverse Polarity SMA

2.4GHz Antenna Description & Manufacturer

| | VCT Model # | Supplier Part # | Manufacturer | Type | Frequency | Gain |
|---|----------------|-----------------|----------------|----------------|-----------|-------|
| | RUB-243s | TLB-2400BL | Boboto Telecom | Ducky | 2.4GHz | 3dBi |
| | RUB-243RPS | TLB-2400BLS | Boboto Telecom | Ducky | 2.4GHz | 3dBi |
| | ANT-2408ip/RPS | HX5820Z08A/X951 | Wellhope Comm. | External Patch | 2.4GHz | 8dBi |
| - | ANT-2415dp | HX5820Z08A/X951 | Wellhope Comm. | Internal Patch | 2.4GHz | 15dBi |

RPS = Reverse Polarity SMA