Modular Approval Request

Applicant: VideoComm Technologies (1156488 Ontario Inc.)
FCC ID: SU5-TMX24120

November 5, 2012

To Whom It May Concern:

Pursuant to Section 15.212(a)(1) of the FCC rules, the Applicant hereby requests for modular approval, compliance with the requirements are addressed below.

Modular Approval Requirements	**Justification**
(i) The radio elements of the modular transmitter must have their own shielding. The physical crystal and tuning capacitors may be located external to the shielded radio elements.	The module has its own shield.
(ii) The modular transmitter must have buffered modulation/data inputs (if such inputs are provided) to ensure that the module will comply with part 15 requirements under conditions of excessive data rates or over-modulation.	See Attached Document
(iii) The modular transmitter must have its own power supply regulation.	The module has its own power supply regulation.
(iv) The modular transmitter must comply with the antenna and transmission system requirements of §§ 15.203, 15.204(b) and 15.204(c). The antenna must either be permanently attached or employ a ''unique'' antenna coupler (at all connections between the module and the antenna, including the cable). The ''professional installation'' provision of § 15.203 is not applicable to modules but can apply to limited modular approvals under paragraph (b) of this section.	The module required professional installation.
(v) The modular transmitter must be tested in a stand-alone configuration, *i.e.*, the module must not be inside another device during testing for compliance with part 15 requirements. Unless the transmitter module will be battery powered, it must comply with the AC line conducted requirements found in § 15.207. AC or DC power lines and data input/output lines connected to the module must not contain ferrites, unless they will be marketed with the module (see § 15.27(a)). The length of these lines shall be the length typical of actual use or, if that length is unknown, at least 10 centimeters to insure that there is no coupling between the case of the module and supporting equipment. Any accessories, peripherals, or support equipment connected to the module during testing shall be unmodified and commercially available (see § 15.31(i)).	The module was tested in a stand-alone configuration.

(vi) The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying its FCC identification number. (A) If using a permanently affixed label, the modular transmitter must be labeled with its own FCC identification number, and, if the FCC identification number is not visible when the module is installed inside another device, then the outside of the device into which the module is installed must also display a label referring to the enclosed module. This exterior label can use wording such as the following: ‘‘Contains Transmitter Module FCC ID: XYZMODEL1’’ or ‘‘Contains FCC ID: XYZMODEL1.’’ Any similar wording that expresses the same meaning may be used. The Grantee may either provide such a label, an example of which must be included in the application for equipment authorization, or, must provide adequate instructions along with the module which explain this requirement. In the latter case, a copy of these instructions must be included in the application for equipment authorization. (B) If the modular transmitter uses an electronic display of the FCC identification number, the information must be readily accessible and visible on the modular transmitter or on the device in which it is installed. If the module is installed inside another device, then the outside of the device into which the module is installed must display a label referring to the enclosed module. This exterior label can use wording such as the following: ‘‘Contains FCC certified transmitter module(s).’’ Any similar wording that expresses the same meaning may be used. The user manual must include instructions on how to access the electronic display. A copy of these instructions must be included in the application for equipment authorization.	The module is labeled with its own FCC ID number. Instructions are given to the end user in the user manual, if the module is installed in another device where the FCC ID is not visible, then the outside of the device must also display a label referring to the enclosed module.
(vii) 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. A copy of these instructions must be included in the application for equipment authorization.	Instructions are given in the user manual.
(viii) The modular transmitter must comply with any applicable RF exposure requirements in its final configuration.	The module complies with RF exposure limits as documented in this filing

Sincerely,
Jeff Johnson

November 5, 2012

MODULAR APPROVAL REQUIREMENTS

(b) The module shall have buffered modulation/data input(s) (if such inputs are provided) to ensure that the module will comply with the requirements set out in the applicable RSS standard under conditions of excessive data rates or over-modulation.

Explanation and justification:

The system uses RTC6763 for AV packets transmission. RTC6763's buffer structure is depicted in the attached file, "Single Transmit buffer.pdf", a big (transmit) buffer is used to store the AV packets for transmission in next time slot (1.67ms/slot). The other small (receive) buffer is used to store acknowledgement from receiving end. RTC6763's MAC controller uses "store & forward" mechanism to control the media access.
Therefore, it's not possible to operate in excessive data rates or over-modulation.

1016C Sutton Drive, Unit 6, Burlington, ON Canada L7L 6B8
Tel: 905.336.9665 Fax: 905.336.9662 www.VideoTransmitters.com

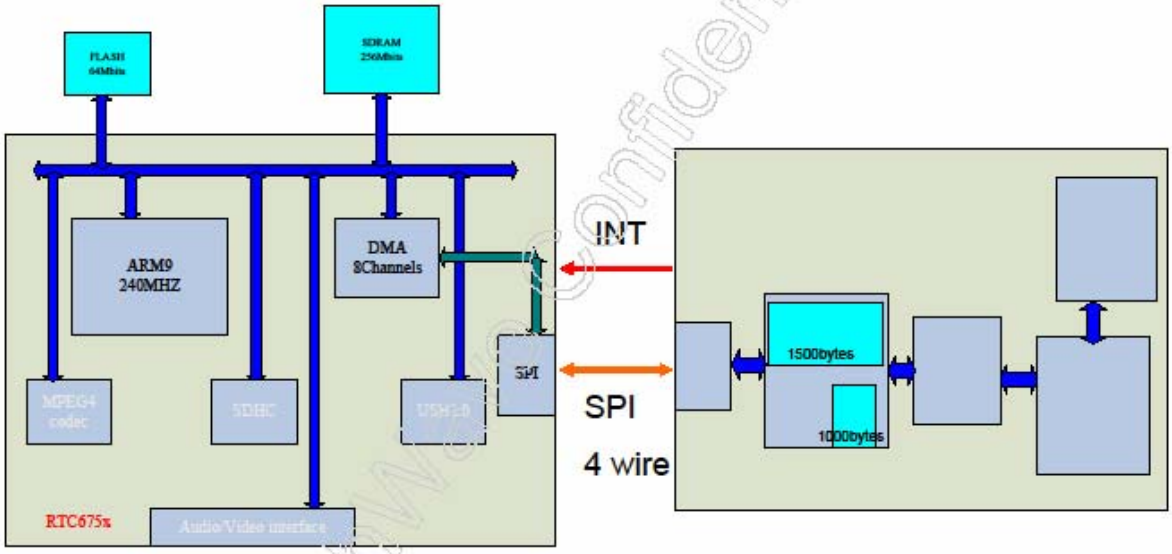
VIDEOCOMM TECHNOLOGIES

Single Transmit Buffer

RichWave 立積電子

DAV Architecture

Wireless real time AV system



SPI 4 wire : CS, SCK, SDI, SDO

SPI Master : RTC675x, SPI Slave : RTC6763

1016C Sutton Drive, Unit 6, Burlington, ON Canada L7L 6B8
Tel: 905.336.9665 Fax: 905.336.9662 www.VideoTransmitters.com