

To whom it may concern,

*Parkeon* would like to apply for Modular FCC Approval. This letter is our application for such according to FCC Part 15.212:

<b>Modular transmitter requirements</b>	<b>Manufacturer clarification</b>
A- In order to be considered a transmitter module, the device must be a complete RF transmitter, i.e. it must have its own reference oscillator (e.g. VCO), antenna, etc. The only connectors to the module, if any, may be the power supply and modulation/data inputs.	A reference oscillator is 27.12MHz quartz A specific Antenna is connected to Module Lect Cless Data inputs are transmitted by a RS232 serial communication to Module Lect Cless Power supply is connected to a sub-D 15 pins connector on Module Lect Cless
B- Compliance with FCC RF exposure requirements may, in some instances, limit the output power of a module and/or the final applications in which the approved module may be employed.	Measures for FCC RF exposures requirements were performed at maximal power
C- While the applicant for a device into which an authorized module is installed is not required to obtain a new authorization for the module, this does not preclude the possibility that some other form of authorization or testing may be required for the device (e.g. a WLAN into which an authorized module is installed must still be authorized as a PC peripheral, subject to the appropriate equipment authorization).	Module Lesct Cless is only installed in Parkeon's machine; when it will be integrated in new Parkeon's product, Parkeon will verify if supplementary tests or from of authorization are required
D- In the case of a modular transceiver, the modular approval policy only applies to the transmitter portion of such devices. Pursuant to Section 15.101(b), the receiver portion will either be subject to Verification, or it will not be subject to any authorization requirements (unless it is a Scanning Receiver, in which case it is also subject to Certification, pursuant to Section 15.101(a)).	Module Lect Cless is a transceiver. It operates at 13.56 MHz in respect of the ISO14443 standard. Data are received on transceiver by a sub carrier modulation of 848KHz on the 13.56MHz carrier modulation of the transmitter which is not causing harmful interference
E- The holder of the grant of equipment authorization (Grantee) of the module is responsible for the compliance of the module in its final configuration, provided that the OEM, integrator and/or end user has complied with all of the instructions provided by the Grantee which indicate installation and/or operating conditions necessary for compliance.	Operational description indicates conditions of integration of the equipment. More over, it's only integrated in Parkeon's machines
1- The modular transmitter must have its own RF shielding. This is intended to ensure that the module does not have to rely upon the shielding provided by the device into which it is installed in order for all modular transmitter emissions to comply with Part 15 limits. Such coupling may result in non-compliant operation.	A RF shielding is made with the metal box (See pictures in T2X-V2-CLESS external_photos.pdf
2- The modular transmitter must have buffered modulation/data inputs (if such inputs are	Data inputs are not directly connected to the HF stage. Data inputs are numeric inputs connected

provided) to ensure that the module will comply with Part 15 requirements under conditions of excessive data rates or over modulation.	to the HF stage by way of a FPGA which has a internal buffer
3- The modular transmitter must have its own power supply regulation. This is intended to ensure that the module will comply with Part 15 requirements regardless of the design of the power supplying circuitry in the device into which the module is installed.	T2X-V2-CLESS has it's own power supply converters (linear and DC.DC) which generates all the internal voltages.
4- The modular transmitter must comply with the antenna requirements of Section 15.203 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). Any antenna used with the module must be approved with the module; either at the time of initial authorization or through a class II permissive change. The "professional installation" provision of Section 15.203 may not be employed for modules.	T2X-V2-CLESS is a equipment which must be professionally installed (see professional installation justification in cover letter. The passive Antenna is connected to the module lect Cless with a specific coaxial cable ( SMB connectors).
5- The modular transmitter must be tested in a stand-alone configuration, i.e. the module must not be inside another device during testing. This is intended to demonstrate that the module is capable of complying with Part 15 emission limits regardless of the device into which it is eventually installed.	T2X-V2-CLESS was tested alone. See EMitech Radio Measurement Certification Report (D051-PTC-10-104464)
6- The modular transmitter must be labeled with its own FCC ID number, and, if the FCC ID 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.	FFC ID of module lect Cless is T2X-V2-CLESS. See T2X-V2-CLESS-Lable_Location_Information.pdf)
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 equipement is only integrated by Parkeon
8- the modular transmitter must comply with any applicable RF exposure requirements.	See Emitech Radio Measurement Certification Report (D051-PTC-10-104464)

Sincerely, 01-27-2011 Maurel