

September 19, 2008

Chief, Authorizations Branch  
Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046

Subject: Request for unlicensed Modular Transmitter Approval.

Reference: FCC 07-56A1 47 CFR 15.212

To Whom It May Concern:

Alereon, Inc. hereby requests FCC Equipment Authorization as a Singular Modular Transmitter of the Alereon, Inc. Model AL5708 PCIe MiniCard module FCC ID: U9YAL5708. Alereon, Inc. intends to manufacture this device and market it under several brand names and brand I.D.s as a computer modular component. This letter addresses the information required by points one through eight of 47 CFR 15.212.

1. The modular transmitter must have its own RF shielding. Shielding necessary for normal operation is accomplished by a metal shield enclosure which attaches to the printed wiring board and encloses the RF circuitry, including the frequency-determining element.

2. The modular transmitter must have buffered modulation/data inputs. The Alereon AL5708 receives data via the industry-standard PCI-e interface. This interface is implemented within the AL5350 integrated circuit as may be seen on sheet five of the schematic diagram included in the filing for FCC Equipment Authorization. The PCI-e interface limits the data rate to those defined by the PCI standard.

3. The modular transmitter must have its own power supply regulation. The Alereon AL5708 receives power from the host system PCI-e socket. The +3.3 Volt source from the host system is filtered on the module to power a +3.3V domain and regulated on the module to produce the main +1.2V digital subsystem domain. The +3.3V domain is also regulated on the module to produce two additional power domains required by the module circuitry; +2.4V and +1.2V. The power regulation topology may be seen on sheet nine of the schematic diagram included in the filing for FCC Equipment Authorization.

4. The modular transmitter antenna must comply with the antenna and transmission system requirements of sections 15.203, 15.204(b) and 15.204(c). The antenna employed with the AL5708 is an Omron HKFF, a PIFA-type antenna which in normal operation is installed within the host laptop P.C. The antenna connects to the AL5708 minicard via a type U.FL connector which is not accessible to the user. The connector complies with the requirement of FCC 15.203 for a unique coupling.

5. The modular transmitter must be tested in a stand-alone configuration. As described in section 2.6.3 of the test report included in the filing for FCC Equipment Authorization, the AL5708 UWB Module plus antenna was tested without housing, connected to the PCI-e socket of a P.C. through an extender card that placed the device under test completely outside of the PC chassis. The AL5708 is designed with an industry standard PCI-e minicard connector as its electrical and mechanical interface to the host system. This connector defines the deployment of the module which is intended to be directly connected to the host system via the PCI-e interface.

6. The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying its FCC identification number. The Alereon AL5708 is intended to be placed within a laptop P.C. housing unique to the brand I.D. under which it is being marketed. The prescribed label with the FCC Identifier will be applied to the outside of the housing. An example of the label which will be used is included in the filing for FCC Equipment Authorization.

7. The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter. Part 15.519 of the FCC rules and Regulations requires that a UWB transmitter shall transmit only when it is sending information to an associated receiver. That rules part also requires that the UWB intentional radiator shall cease transmission within 10 seconds unless it receives an acknowledgement from the associated receiver that its transmission is being received. An acknowledgment of reception must continue to be received by the UWB intentional radiator at least every 10 seconds or the UWB device must cease transmitting. This requirement is met by design and is implemented by the firmware encoded into the device.

8. The modular transmitter must comply with any applicable RF exposure requirements in its final configuration. There are no RF exposure requirements for UWB devices operating under subpart F of the FCC Rules and Regulations.



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