

April 28, 2022

RE FCC ID: UFE-AXFY1

To the certification reviewer:

We are hereby applying for full modular approval of the above-referenced FCC ID, based on compliance with all of the criteria as detailed below.

Sincerely,

Stephen Pallotta, NCE

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Sr. Principal Compliance Engineer

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Part 15 Unlicensed Single Modular Transmitter Approval Justification per 15.212

| | Requirement per 15.212 | reference |
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| (i) | The radio elements of the modular transmitter must have their own RF shielding. | Shielding is provided by a metal cover over the circuitry. |
| (ii) | The modular transmitter must have buffered modulation/data inputs (if such inputs are provided. | All modulation and data inputs are buffered by circuitry on the transmitter chip. |
| (iii) | The modular transmitter must have its own power supply regulation. | Power supply regulation is provided by circuitry on the module and on the transmitter chip. |
| (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 is a PCB trace antenna embedded in the module pcb. |
| (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 parameters. | Testing was performed on the standalone module, as shown in the test setup photos. |

| (vi) | The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying its FCC identification number. 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. | A sample of the host label is provided as an exhibit, showing the FCC identifier of the module. |
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| (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. | The module complies fully with the operating requirements of Part 15 section Subpart B; Subpart C section 15.247 and Part 2 section 2.1091] as demonstrated in the test report exhibits. |
| (viii) | The modular transmitter must comply with any applicable RF exposure requirements in its final configuration. | The module complies fully with the operating requirements of FCC Rules Part 2 section 2.1091 and section Part 15 section 15.247(i) as demonstrated in the test report exhibit. |