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

February 23, 2010

**RE: Request for unlicensed Modular Transmitter Approval.**

Reference FCC 07-56A1 47 CFR 15.212

To Whom It May Concern:

Staccato Communications Inc. hereby requests FCC Equipment Authorization as a singular Modular Transmitter of the Staccato Communications RC2 Model WUSB Dongle Module, FCC ID: UQL-RC2-SC4404R. Staccato Communications intend to manufacture this device and market it under several brand names and brand I.D.s as a computer accessory, it is not intended to be built into an item of equipment. This letter addresses the information required by (a)(1) through to (a)(8) of 47 CFR 15.212.

**(a)(1) The Modular transmitter must have its own RF shielding:**

This transmitter is designed to operate stand-alone in its own enclosure connected to industry standard USB 2.0 interfaces. All shielding necessary for normal operation is provided by the multi-layer layout of printed circuit board which is constructed with multiple ground layers. An additional metal shielding can is fitted topside.

**(a)(2) The Modular transmitter must have buffered modulation or data inputs:**

The Staccato Communications RC2 WUSB Dongle Module uses the industry standard USB 2.0 interface for data and the interface is implemented within the ISP1705 integrated circuit as may be seen on page two of the schematic diagram included in the filing for FCC equipment Authorization. The USB interface limits the data rate to that defined by the USB standard.

**(a)(3) The Modular transmitter must have its own power supply regulation:**

The Staccato Communications RC2 WUSB Dongle Module is powered from an industry standard USB 2.0 interface of a host PC. This provides 5V source which is then regulated on the module to generate four power domains (+3.3V, +1.0VD, +1.0VA\_RF and +1.0VA\_PLL) that are required by the module. The power regulation circuitry may be seen on page three of the schematic diagram included in the filing for FCC equipment Authorization.

**(a)(4) The Modular transmitter must comply with the antenna and transmission system requirements of §§ 15.203, 15.204(b) and 15.204(c):**

The Staccato Communications RC2 WUSB Dongle Module is provided with a mini RF connector, not accessible to the end user. The ACON ADM6P-700042 UWB antenna is integrated into the plastic enclosure.



**(a)(5) The Modular transmitter must be tested in a stand-alone configuration:**

As described in section 2.9.1 of the test report included in the filing for FCC Equipment Authorization, the Staccato Communications RC2 WUSB Dongle Module was powered from an industry standard USB 2.0 interface of a host PC and tested without a plastic housing.

**(a)(6) The Modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying FCC identification number :**

The FCC identifier will be placed onto the plastic enclosure of the Staccato Communications RC2 WUSB Dongle Module. An example of the label is included in the filing for FCC equipment Authorization.

**(a)(7) The Modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter:**

FCC part 15.519 (a)(1) , Technical requirements for hand held UWB systems, requires that a UWB device shall transmit only when it is sending information to an associated receiver and the UWB intentional radiator shall cease transmission within 10 seconds unless it receives an acknowledgment from the associated receiver that its transmission is being received. It also requires that 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. The Staccato Communications RC2 WUSB Dongle Module meets this requirement and is implemented in the firmware.

**(a)(8) The Modular transmitter must comply with any applicable RF Exposure requirements:**

There are no RF immunity requirements for hand-held UWB devices under subpart F of the FCC Rules and Regulations.

Yours sincerely



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