Dear FCC/TCB representative,

We request **"Limited Modular Approval" (LMA)** for our proprietary VTGP transceiver card, which will be installed exclusively by us, the Grantee, in products which we will design and manufacture. This device is a complete RF transmitter, i.e., it has its own reference oscillator (e.g., VCO), antenna, etc. The only connectors to the module are power supply and modulation/data inputs.

Compliance with FCC RF Exposure requirements is passing and is calculated in accordance with the test report, with sufficient margin. We are aware that the end device into which an authorized module is installed is not required to obtain a new authorization for the module, however this does not preclude the possibility that some other form of authorization or testing may be required for the device in the end application.

The modular transmitter *does not* have its own RF shielding. However, the module does not rely upon external shielding in order for all modular transmitter emissions to comply with Part 15 emissions limits. The RF transceiver is installed in VT(r)xxxxyzzzzp series of thermostats which have the same enclosure, electronics, rf module and all other electronics installed in them

The modular transmitter has 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.

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. The unit is sold with the power supply it was tested with and no other supplies are certified for use at the current time.

The modular transmitter complies with the antenna requirements of Section 15.203 and 15.204(c). The antenna is a PCB trace antenna.

Any additional antennas will result in a Class II permissive change. The modular transmitter was tested in a VTR8350A5500P Chassis which is the same enclosure type as all the other VT(r)xxxxyzzzzp chassis. This shows that the VT8350A5500P unit and the product family VT(r)xxxxyzzzzp are capable of complying with Part 15 emission limits regardless of the VT(r)xxxxyzzzz thermostat into which it is eventually installed.

The modular transmitter will be labelled with its own FCC ID number, and, the unit will be sold as it was tested.

Internal documentation regarding the use of this module explains this requirement. As this module will be for use exclusively by the Grantee, we attest that we will retain control of this labelling and ensure this requirement is met on the end use product. The modular transmitter complies with all the specific rules or operating requirements applicable to this transmitter
and we attest that we will provide adequate instructions along with the module to explain any such requirements that need to be met when this modular transmitter is incorporated into another device. A copy of these internal instructions are included in the application for equipment authorization. The modular transmitter complies with any applicable RF exposure requirements, as per the test report. The end device manual will provide specific installation and operating instructions for users, installers and other interested parties to ensure compliance, such as that 'a minimum distance of 20cm between the antenna and any person is to maintained during operation'.

As the shielding requirement is not met, we request a *limited* modular approval. We, the grantee attest that we will not modify the electrical or mechanical construction of the units to retain control over the emission characteristics. The product is not intended to be used inside another equipment of any kind, it will be sold and used as is in the enclosure provided by Viconics.

Sincerely,

Paolo Primiani