Viconics Electronics Inc. Tel.: (514) 321-5660

9245 Langelier Blvd., St.Léonard, Québec Canada H1P 3K9 Fax: (514) 321-4150

www.viconics.com

Dear FCC/TCB representative,

We request **"Modular Approval"** for our proprietary VWG-APP radio module, which will be installed in products that need Zigbee wireless communication functionality.

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 (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).

The modular transmitter does have its own RF shielding and was tested on a test board with only power and data inputs connected.

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 modular transmitter complies with the antenna requirements of Section 15.203 and 15.204(c).

The antenna type used in the product is a reverse polarity SMA connector (3dbi whip). There is also provision of using the antenna with a approx 5 feet extension cable. Test data from this antenna is included with the test report. Any modification to the antennas will result in a Class II permissive change.

The modular transmitter was tested in a stand-alone configuration, i.e., the module was not inside another device during testing. This shows that the module is capable of complying with Part 15 emission limits regardless of the device into which it is eventually installed.

The modular transmitter will be labelled 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 will also display a label referring to the enclosed module. This exterior label of such products will use wording such as the following: "Contains Transmitter Module FCC ID: V95-VWG-APP".

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 the manufacturer's installation procedure.

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 all the requirements have been satisfied, we request a modular approval for our VWG-APP product

I the undersigned attest that I am an authorized representative of Viconics and attest to the above.

Paolo Primiani

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May 27, 2009