

Telecommunication Certification Body
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Mühlau, 01.04.2018

Subject: Professional Installation (KDB 353028 D01, sections II.A.2.c) attestation.

To whom it may concern,

We have provided below the justification for considering the ARU 3400 product is requiring professional installation, and therefore the use of standard antenna connectors is acceptable under FCC Regulations.

c) Professional installation

i) Professional installation must be justified in the filing, and grant condition must state "This device must be professionally installed."

Justification to support professional installation is given below and as part of this FCC filing.

The grant contains the required text "This device must be professionally installed".

ii) Professional installation does not permit use of any antenna with the transmitter; the permitted types of antenna must be specified.

The permitted antenna types that can be used with the device are patch and near field antennas. This is stated in the Operational Description and shown in the installation guide.

iii) The applicant should address the following items when justifying professional installation.

(1) To qualify for professional installation, the applicant must explain why the hardware is not readily available to average consumer.

The device is sold directly to system integrators, distributors and installers and, hence, is not made available to the general public.

Installation and setup of an RFID system is performed by professionally trained installers to fulfil required safety standards and to ensure the performance in the specific application.

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- (2) *Marketing—Device cannot be sold via retail to the general public or by mail order; it must be sold to authorized dealers or installers only.*

The device is sold directly to system integrators, distributors and installers and is not made available for general public consumption.

- (3) *Filing must show that intended use is not for consumers and general public; rather device is generally for industrial/commercial use.*

The device is part of tolling, tagging and identification applications providing the wireless connection between UHF RFID Tags and a data processing or ERP system.

- (4) *Explain what is unique, sophisticated, complex, or specialized about the equipment that REQUIRES it to be installed by a professional installer?*

Correct installation of the device is required to ensure that the performance of the system, that means reading speed, behavior in dense reader modes (applications with more than one reader) to avoid interference between the systems and safety requirements must be met.

iv) Other professional installation requirements.

- (1) *Installation must be controlled.*

An RFID reader system is complex, requiring know how on installation, setup and embedding in the identification process. The various components and devices (antennas, reader, middleware and backend system) need to be carefully specified to work properly together. As a result, installation of a system that includes this RFID device is performed by professionally trained installers and consultants.

- (2) *Installed by licensed professionals (e.g., device sold to dealer who hire installers).*

This device is only sold to system integrators, distributors and installers and is not made available on the general retail market for the average consumer to purchase.

- (3) *Installation requires special training (e.g., special programming, access to keypad, field strength measurements made).*

Training is provided on the installation of this device as part of the overall installation of the RFID system to achieve and maintain the performance of the whole system.

In addition, only professional installers with specific RFID knowledge have the required capability to adjust, repair or replace this device.