

Date: 24 May 2019

PHOENIX TESTLAB GmbH Product Certification Königswinkel 10 D 32825 Blomberg

Attn: Reviewing Engineer

Subject: REQUEST FOR FCC Part 15 MODULAR TRANSMITTER APPROVAL

**FCC ID: WTM-NFCREADER2** 

To Whom It May Concern:

We, (Desko GmbH, Gottlieb-Keim-Str. 56, 95448 Bayreuth), hereby request  $\boxtimes$  a modular /  $\square$  limited modular approval.

In CFR47 §15.212 "Modular Transmitters" and KDB 996369 D01 "Module Equip Auth Guide" there are following eight numbered requirements defined:

- 1. The radio elements must have the radio frequency circuitry shielded. Physical components and tuning capacitor(s) may be located external to the shield, but must be on the module assembly. [Shielding is provided by a metal cover over the circuitry. Tuning capacitors are on the antennas, which are a fixed part of the assembly.].
- 2. The modular transmitter must have 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. [All modulation and data inputs are buffered by circuitry on the transmitter chip.].
- 3. The modular transmitter must have its own power supply regulation on the module. [Power supply regulation is provided by circuitry on the transmitter chip.].
- 4. The module must contain a permanently attached antenna, or contain a unique antenna connector, and be marketed and operated only with specific antenna(s), per §§ 15.203, 15.204(b), 15.204(c), 15.212(a), 2.929(b). [The antenna employs a unique antenna coupler.].
- 5. The module must demonstrate compliance in a stand-alone configuration. [Testing was performed with the module extended outside of the host on a special extender board, as shown in the test setup photos.].
- 6. The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying its FCC identification number (KDB 784748).

  [A sample of the host label is provided as an exhibit, showing the FCC identifier of the module.].
- 7. The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter and the manufacturer must provide adequate instructions along with the module to explain any such requirements

[The module complies fully with the operating requirements of Part 15 section [...] as demonstrated in the test report exhibit.].

8. The modular transmitter must comply with any applicable RF exposure requirements in its final configuration. [This module operates under Part 15 section [...], which is exempt from RF exposure evaluation owing to the very low operating power.].

Yours sincerely,

[Harald Schmaus, Manager Hardware]

Kerrell Ll

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