



November 27, 2008

Federal Communications Commission
Authorization and Evaluation Division
1435 Oakland Mills Road
Columbia, MD 21046

SUBJECT: FCC Application for WUR – ZRM10

Dear FCC/TCB representative:

We request “Modular Approval” for our Energate ZRM10 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 Radio 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 without an enclosure 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 does 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 PCB mount chip antenna (Fractus FR05-S1-N-0-102). Test data for this antenna can be obtained from the device datasheet. Any modification to the antenna 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 is labeled 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. The exterior label of such products will use wording such as the following: "Contains FCC ID: WUR – ZRM10". 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 be maintained during operation". As all the requirements have been satisfied, we request a modular approval for our ZRM10 Radio Module.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jorge Deligiannis', with a long horizontal flourish extending to the right.

Jorge Deligiannis
Chief Technology Officer