

Federal Communications Commission
Equipment Authorization Division,
Application Processing Branch
7435 Oakland Mills Road
Columbia, MD 21046

Request for Modular Approval

FCC ID: XRH-NPE103
IC: 11922A-NPE103

We would like to request the limited modular approval be changed to a singular full modular approval. The previous limitation of the shielding has been met by the addition of a shield over the NFC transmitter circuitry.

Pursuant to FCC Part 15.212, and RSP-100, issue 2, Section 10.2, we would like to request modular approval for the module with the aforementioned FCC ID. The following shows how each of the 8 requirements for modular approval have been met:

A single-modular transmitter is a self-contained, physically delineated, component for which compliance can be demonstrated independent of the host operating conditions, and which complies with all eight requirements of § 15.212(a)(1) and RSP-100 Form D as summarized below. See § 15.212 for more detailed information, and § 2.901, et seq., for general certification requirements

Justifications in RED

- 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;

The transmitter circuitry for both radios are contained within their own shielding. See external photos.

- 2) The module must have buffered modulation/data inputs to ensure that the device will comply with Part 15 requirements with any type of input signal;

All inputs to the modules are buffered through microprocessor inputs.

- 3) The module must contain power supply regulation on the module;

Internal power regulators Refer to the Block-diagram

- 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);

Refer to the internal photo

- 5) The module must demonstrate compliance in a stand-alone configuration;

The EUT was tested in a standalone configuration via a SD extension cable – Refer to the test setup photo

- 6) The module must be labeled with its permanently affixed FCC ID label, or use an electronic display (see KDB Publication 784748);

Refer to the external photo and the user manual

- 7) The module must comply with all specific rules applicable to the transmitter, including all the conditions provided in the integration instructions by the grantee;

Refer to the user manual

- 8) The module must comply with RF exposure requirements

Refer to the RF exposure statement for details

Sincerely,



Nic Johnson, NCEE Labs (authorized agent)