Dear Industry Canada / FCB and FCC / TCB representative,

We request **"Limited Modular Approval" (LMA)** for our HT205 module, which will be installed exclusively by us, the Grantee, in products which we will design and manufacture. This is in accordance with RSS-GEN section 7.1.2 and FCC Part 15, Subpart C, Section 15.212.

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 Industry Canada Safety Code 6 RF Exposure requirements and FCC Maximum permissible exposure and 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 not*** have its own RF shielding. However, the module does not rely upon the shielding provided by the device into which it is installed in order for all modular transmitter emissions to comply with RSS-210 and FCC Part 15 emissions limits. Coupling between the RF circuitry of the module and any wires or circuits in the device into which the module is installed that may result in non-compliant operation, will be verified on a end-product basis.

The limited modular transmitter does not have buffered modulation/data inputs; however the data will be controlled by the host unit in which the module is placed.

The limited modular transmitted does not have its own power supply; however the power supply circuitry in the host unit is controlled by the manufacturer.

The modular transmitter complies with the antenna requirements of RSS-210 and FCC part 15. The antenna is a PCB trace antenna with no provisions for field replacement.

The modular transmitter was tested in a typical host unit. The host unit is controlled by the manufacturer and shows the module is capable of meeting the RSS-210 and Part 15 emissions limits.

The transmitter module is DC powered, and is exempt from power line conducted emissions testing, however the host was tested for AC power line conducted emissions

The power lines and data lines connected to the module does not contain ferrites which will not be marketed with the product. The lengths of these lines are typical of actual use in the product.

The modular transmitter was tested in a host system which is manufactured by the grantee.

The modular transmitter will be labeled with its own IC/FCC ID number, and, if the IC/FCC ID number 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 IC: 9261A-HT205” and “FCC ID: YZY-HT205”. Included in our application is an example of this label.

Internal documentation regarding the use of this module explains this requirement. As this module will be for use exclusively by the Grantee, we attest that we will retain control of this labeling and ensure this requirement is met on the end use product.

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 1 cm between the antenna and any person is to maintained during operation’.

As the shielding requirement and other full modular requirements are not met, we request a ***limited*** modular approval.

We, the grantee attest that we will retain control over the final installation of the device, such that compliance of the end product is assured. We recognize that an operating condition on the grant of equipment authorization for the module will state that the module is only approved for use when installed in devices produced by us, “Paradigm Electronics, 205 Annagem Blvd, Mississauga Ontario Canada”, the Grantee.

Control of the end product(s), into which the module will be installed, will be maintained by verification of the end product(s), such that full compliance of the end product is always ensured.

I the undersigned attest that I am an authorized representative of Paradigm Electronics, 205 Annagem Blvd, Mississauga Ontario Canada and attest to the above.

Signature

Greg Salt
Plant Manager
Paradigm Electronics