

2019-11-25

**RE FCC ID: ZAS-HCPBLE01**

**To the certification reviewer:**

We are hereby applying for limited single modular approval of the above-referenced FCC ID, based on compliance with all of the criteria as detailed below.

Sincerely,



Therese Berg  
Senior Electrical Compliance Specialist

**Part 15 Unlicensed Single Modular Transmitter Approval Justification per 15.212**

Requirement per 15.212	Reference
(i) The radio elements of the modular transmitter must have their own RF shielding.	Shielding is provided by a metal cover over the circuitry and a ground plane on the printed wiring board.
(ii) The modular transmitter must have buffered modulation/data inputs (if such inputs are provided).	All modulation and data inputs are buffered by circuitry on the transmitter chip.
(iii) The modular transmitter must have its own power supply regulation.	Power supply regulation is provided by internal circuitry over the range of 1.8 to 5.5 volts.
(iv) The modular transmitter must comply with the antenna and transmission system requirements of §§ 15.203, 15.204(b) and 15.204(c).	Variant 5901904-01: The antenna is permanently attached. Variant 5901904-02: The antenna employs a unique antenna coupler.
(v) The modular transmitter must be tested in a stand-alone configuration, i.e., the module must not be inside another device during testing for compliance with Part 15 parameters.	Testing was performed with the module extended outside of the host on a special extender board, as shown in the test setup photos.

<p>(vi) The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying its FCC identification number. 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 must also display a label referring to the enclosed module.</p>	<p>A sample of the host label is provided as an exhibit, showing the FCC identifier of the module.</p>
<p>(vii) The modular transmitter must comply with any specific rules or operating requirements that ordinarily apply to a complete transmitter and the manufacturer must provide adequate instructions along with the module to explain any such requirements. A copy of these instructions must be included in the application for equipment authorization.</p>	<p>The module complies fully with the operating requirements of Part 15 section 15.247 as demonstrated in the test report exhibit.</p>
<p>(viii) The modular transmitter must comply with any applicable RF exposure requirements in its final configuration.</p>	<p>FCC Rules in Sections 2.1091, 2.1093 and specific Sections of Part 15, including 15.319(i), 15.407(f), 15.253(f), 15.255(g), and 15.257(g) require that Unlicensed PCS, UNII and millimeter wave devices perform routine environmental evaluation for RF Exposure to demonstrate compliance. In addition, spread spectrum transmitters operating under Section 15.247 are required to address RF Exposure compliance in accordance with Section 15.247(i).</p>