

Modular Approval Request

Sypes Canyon Communications, Inc.

5 July 2012

Dear Application Examiner

Sypes Canyon Communications respectfully requests the grant of a modular approval certification with FCC ID allocation for the SCC-002 mobile earth-station transmitter. The SCC-002 radio transmitter will be integrated into a variety of mobile satellite service ("MSS") devices for remote telemetry applications, including domestic and international tracking. The SCC-002 will be operated at 30 cm or more from a persons' bodies, transmitting in Globalstar, Inc.'s MSS service link at 1611.25-1618.25 MHz. As described in the FCC Office of Engineering and Technology's February 3, 2011 publication "Equipment Authorization Guidelines for Part 25 Transmitters", certification of this mobile earth-station transmitter under Part 25 of the Commission's rules is optional and therefore permitted. See 273109 D01 Equip Auth Guide Part 25 TXReceiver v02r02 at 1.

In addition to the FCC modular approval being sought, Sypes Canyon is simultaneously securing international regulatory certifications. The FCC Part 25 modular approval will be followed by a filing with the ITU GMPCS MoU registry to permit freedom of use of this mobile earth-station transmitter in those countries that are signatories to the GPMCS MoU. To that end, pre-approval of the SCC-002 transmitter from a recognized regulatory body such as the FCC will help facilitate ITU approval in the various applications that will incorporate the SCC-002 for international use. A number of the signatory countries use FCC reports and the FCCID as proof that the product is acceptable for use in their own country. The FCCID makes it possible for the other regulators to review the test reports directly online via the FCC website, fully confident that they are reviewing unaltered results.

The requirement of Public Notice DA00-1407 and 996369 D01 Mobile Equip Auth Guide v01 have been met and shown on the following statements.

1. "The final device is designed for mobile or fixed operation (Portable is not permitted- Reference TCB Exclusion Lis (17 July 2002) | | (g))."

The SCC-002 is to be used as a mobile module embedded in mobile applications.

2. "The maximum antenna gain to allow compliance with the RF exposure requirements is listed on the Grant of Certification for the module."

The SCC-002 module has been tested and to be used with a 5 dBi (or lower) patch antenna. The SCC-002 with this antenna fulfills the requirements of the FCC CFR 47 Part 25, IC RSS170, FCC §1.1310, §1.1310 for a mobile device, and IC RS102.

3. "The licensed module must have an FCC ID label on the module itself. That FCC ID label must be visible through a window on the final device or it must be visible when an access panel, door or cover is easily removed. If not, a second label must be placed on the outside of the final device that contains the following text: "Contains FCC ID:xxxyyyzzz"."

The SCC-002 module will be labeled with the FCC/IC ID numbers. All devices that use this device will be labeled with "Contains FCC ID:xxxyyyzzz; IC:aaaabbbb".

Gary Naden

CTO

Sypes Canyon Communications, Inc.