

Edison Labs Inc. DBA Orro  
1875 S. Grant Street, Ste 620  
San Mateo, CA 94402

June 25, 2019

Federal Communications Commission  
Office of Engineering and Technology  
7435 Oakland Mills Road  
Columbia, MD 21046

Subject: Limited Modular Approval Request

To whom it may concern:

This letter is to request Limited Modular Approval in accordance with FCC Rule Part 15.212(b) for the certification request under FCC ID: 2ASEJ-ORROSWITCH01. This module is intended for integration into devices constructed by the grantee.

*Declaration of conditions.*

Y/N	<b>15.212(a)(1) Condition</b>
Y	(i) The radio elements of the module have their own shielding. The physical crystal and tuning capacitors may be located external to the shielded radio elements
Y	(ii) The module 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.
Y	(iii) The module has its own power supply regulation.
Y	(iv) The module complies with the antenna and transmission system requirements of §§15.203, 15.204(b) and 15.204(c). The antenna(s) are either permanently attached or employ a “unique” antenna coupler (at all connections between the module and the antenna, including the cable).



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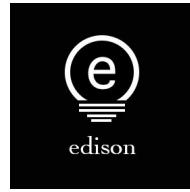
Y	(v) The module was tested in a stand-alone configuration, i.e., the module was not inside another device during testing for compliance with part 15 requirements. Unless the transmitter module will be battery powered, it complies with the AC line conducted requirements found in §15.207. AC or DC power lines and data input/output lines connected to the module do not contain ferrites, unless they will be marketed with the module (see §15.27(a)). The length of these lines was the length typical of actual use or, if that length is unknown, at least 10 centimeters was used to insure that there is no coupling between the case of the module and supporting equipment. Any accessories, peripherals, or support equipment connected to the module during testing were unmodified and commercially available (see §15.31(i)).
Y	(vi) The module is equipped with either a permanently affixed label or is capable of electronically displaying its FCC identification number.
Y	(vii) The module complies with any specific rules or operating requirements that ordinarily apply to a complete transmitter and the applicant has provided adequate instructions along with the module to explain any such requirements.
Y	(viii) The module complies with any applicable RF exposure requirements in its final configuration. The instructions provided with the module adequately explain any usage conditions or restrictions.

*List of additional restrictions or conditions of use for this module.*

The antenna is not included on the module base. In accordance with KDB 996369, the approval becomes limited to hosts constructed according to manufacturer's instructions.

*Methods used to address restrictions to ensure compliance for all finished products.*

Module is for use in devices under direct control of the grantee.



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I acknowledge on behalf of the applicant that compliance of this module in all final configurations is the responsibility of the applicant under the condition that the integrator follows all provided installation instructions.

Sincerely,

Nima Banai  
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