

DUALi Inc.

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January 24, 2011

Federal Communications Commission
Equipment Authorization Division, Application Processing Branch
7435 Oakland Mills Road
Columbia, MD21046

RE: PART 15 UNLICENSED MODULAR TRANSMITTER APPROVAL

TO WHOM IT MAY CONCERN

We, **DUALi Inc.**, hereby requests for part 15 unlicensed limited modular transmitter approval of our **DE-ABCM** module, described as follows:

Model name: **DE-ABCM**

FCC ID: **SWUDE-ABCM**

1. The modular transmitter must have its own shielding.

The product is a complete RF transmitter. The product does not have its own shielding, however the product itself complies with the FCC part 15B and 15C requirements. The product does NOT rely upon the shielding provided by the device into which it is installed for RF shielding.

2. The modular transmitter must have buffered modulation/data inputs

The module has a memory management unit inside of the main IC. It buffers the data inputs from USB interface.

3. The modular transmitter must have its own power supply regulation

The EUT contains USB interface (DC 5 V input) and own low noise LDO regulator (U3). In case of changes in the supply voltage VCC (for example caused by temperature changes or other effects), the internal voltage will be stabilized.

4. The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204

The transmitter shall only be used with the tested antenna that is integral PCB antenna.

5. The modular transmitter must be tested in a stand-alone configuration

The EUT was tested in a stand-alone configuration. The module was connected with the notebook PC via USB interface, during the test. See also the test report and Test setup photos.

6. The modular transmitter must be labeled with its own FCC ID number

The EUT will be labeled with its own FCC ID number. The label is specified in Label Information document. If the module is installed inside of an end-product, the label will not be visible. In this case the OEM customer will be instructed to how to apply the exterior label.

7. AC, DC, and data input/output lines must not contain ferrites, unless they will be marketed with the module.

The EUT contains ferrites on the USB cable, however the USB cable will be marketed with the module.

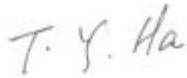
8. The modular transmitter must comply with any specific rule or operating requirements

The EUT is compliant with all applicable FCC rules. Detail instructions are given in the product Instruction Manual.

9. The modular transmitter must comply with any applicable RF exposure requirements.

The EUT is a 13.56 MHz RFID device, and radiates extremely low RF power level. It is categorically excluded from RF exposure requirements.

Sincerely,



Ha Tae Yang/ Director