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To Whom It May Concern:

Epson would like to apply for Modular FCC approval. This letter is our application for such according to FCC public notice DA 00-1407.

160612 RF Modular Transmitter Requirements:

	Requirements for Modular Transmitters	M	anufacturer's Clarification
(a)	In order to be considered a transmitter module, the device must be complete RF transmitter, i.e., it must have its own reference oscillator (e.g., VCO), antenna, etc The only connectors to the module, if any, may be power supply and modulation/data inputs	✓	The transmitter is completed with its own reference oscillator, antenna. Only connectors provide are dc supply and data.
(b)	Compliance with FCC RF Exposure requirements may, in some instances, limit the output power of a module and/or the final applications in which the approved module may be employed	✓	The radio is intended for use with EPSON portable (Handheld) Printers only. It complies with RF Exposure requirement as per 2.1093 & 1.1307(b)(1)
(c)	While the applicant for a device into which an authorized module is installed is not required to obtain a new authorization for the module, 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 the authorized module is installed still be authorized as PC peripheral, subject to the appropriate equipment authorization)	✓	The device complies with FCC Part15, Subpart B, Class B – Unintentional radiators
(d)	In the case of a modular transceiver, the modular approval policy only applies to the	✓	The device complies with FCC Part15, Subpart B, Class

	transmitter portion of such devices. Pursuant	B – Radio Receivers
	to section 15.101(b), the receiver portion will either be subject to Verification, or it will not be subject to any authorization requirements (unless if is a Scanning Receiver, in which case it is also subject to Certification, pursuant to Section 15.101(a)	D - Radio Receivers
(e)	The holder of the grant of equipment authorization (Grantee) of the module is responsible for the compliance of the module in its final configuration, provided that the OEM, integrator, and /or end user has complied with all of the instructions provided by the Grantee which indicate installation and/or operating conditions necessary for compliance.	End-users must comply with the following instruction sated in the users' manual: ✓ Labeling requirement for equipment using this modular transmitter. ✓ RF Exposure Warning for compliance with FCC Rules 2.1093 and 1.1307 when the radio is used in a portable application.
1.	The modular transmitter must have its own RF shielding. This is intended to ensure that the module does not have to rely upon the shielding provided by the device into which it is installed in order for all modular transmitter emissions to comply with Part 15 limits. Such coupling may result in noncompliant operation.	✓ The modular transmitter has its own RF shielding.
2.	The modular transmitter must have 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.	✓ The modular transmitter has buffered modulation/data inputs.
3.	The modular transmitter must have its own power supply regulation. This is intended to ensure that the module will comply with Part 15 requirements regardless of the design of the power supplying circuitry in the device into which the module is installed.	✓ The modular transmitter has its own power supply regulation.
4.	The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204c. The antenna must either be permanently attached or employ a "unique" antenna coupler (at all connections between the module and the antenna, including the cable). Any antenna used with the module	✓ The radio complies with Rules 15.203 and 15.204c. The radio has permanently attached antenna.

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	must be approved with the module: either at		
	the time of initial authorization or through a Class II permissive change. The		
	"professional installation" provision of		
	Section 15.203 may not be applied to		
	modules.		
5.	The modular transmitter must be tested in a	√	The modular transmitter was
J.	stand-alone configuration, i.e. the module	ľ	tested in a stand-alone
	must not be inside another device during		configuration.
	testing. This is intended to demonstrate that		configuration.
	the module is capable of complying with		
	Part 15 emission limits regardless of the		
	device into which it is eventually installed.		
6.	The modular transmitter must be labeled	✓	The modular transmitter is
0.	with its own FCC ID number and if the FCC	•	labeled with its own FCC ID
	ID is not visible when the module is		number. The label is fixed on
			the shield on the PCB.
	installed inside another device, then the outside of the device into which the module		the shield on the PCB.
	is installed must also display a label		
7	referring to the enclosed module.	/	The 1 for 41
7.	The modular transmitter must comply with	✓	The user manual for the
	any specific rule or operating requirements		160612 module contains
	applicable to the transmitter and the		adequate instructions relating
	manufacturer must provide adequate		to the usage requirements of
	instructions along with the module to		the modular transmitter.
	explain any such requirements.		
8.	The modular transmitter must comply with	✓	The modular transmitter
	any applicable RF exposure requirements.		complies with applicable RF
			exposure requirements.

Sincerely,

Dan Lehotsky Senior Manager, RTSC/RDC