

Dear FCC/TCB representative,

We request **“Limited Modular Approval” (LMA)** for our proprietary 802.11b/g card, which will be installed exclusively by us, the Grantee, in products which we will design and manufacture.

This device is a complete RF transmitter, i.e., it has its own reference oscillator (e.g., VCO), antenna, etc. The only connectors to the module, are power supply and modulation/data inputs.

Compliance with FCC RF Exposure requirements is passing and is calculated in accordance with the test report, with sufficient margin.

We are aware that the end device into which an authorized module is installed is not required to obtain a new authorization for the module, however 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 an authorized module is installed must still be authorized as a PC peripheral, subject to the appropriate equipment authorization).

The modular transmitter **does not** have its own RF shielding. However, the module does not 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 emissions limits. Coupling between the RF circuitry of the module and any wires or circuits in the device into which the module is installed that may result in non-compliant operation, will be verified on a end-product basis.

The modular transmitter 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.

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 complies with the antenna requirements of Section 15.203 and 15.204(c). The antenna employs a “unique” antenna coupler (at all connections between the module and the antenna, including the cable). The antenna to be used with the module is included with the test report. Any additional antennas will result in a Class II permissive change.

The modular transmitter was tested in a stand-alone configuration, i.e., the module was not inside another device during testing. This shows that the module is capable of complying with Part 15 emission limits regardless of the device into which it is eventually installed.

The transmitter module is DC powered, and is exempt from 15.207 testing.

The DC power lines and data input/output lines connected to the module do not contain ferrites,. The length of these lines was extended to 10 centimeters.

No accessories, peripherals, or support equipment connected was required, as the modular transmitter can operate in a stand-alone condition.

The modular transmitter will be labeled with its own FCC ID number, and, 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 will also display a label referring to the enclosed module. This exterior label of such products will use wording such as the following: "Contains Transmitter Module FCC ID: VG5RW80G". Included in our application is an example of this label.

Internal documentation regarding the use of this module explains this requirement. As this module will be for use exclusively by the Grantee, we attest that we will retain control of this labeling and ensure this requirement is met on the end use product.

The modular transmitter complies with all the specific rules or operating requirements applicable to this transmitter and we attest that we will provide adequate instructions along with the module to explain any such requirements that need to be met when this modular transmitter is incorporated into another device.

A copy of these internal instructions are included in the application for equipment authorization.

The modular transmitter complies with any applicable RF exposure requirements, as per the test report. The end device manual will provide specific installation and operating instructions for users, installers and other interested parties to ensure compliance, such as that 'a minimum distance of 20cm between the antenna and any person is to be maintained during operation'.

As the shielding requirement is not met, we request a ***limited*** modular approval.

We, the grantee attest that we will retain control over the final installation of the device, such that compliance of the end product is assured. We recognize that an operating condition on the grant of equipment authorization for the module will state that the module is only approved for use when installed in devices produced by us, "RuggedCom", the Grantee.

Control of the end product(s), into which the module will be installed, will be maintained by verification of the end product(s), such that full compliance of the end product is always ensured.

I the undersigned attest that I am an authorized representative of RuggedCom and attest to the above.



Phil Levy, P.Eng.  
S/W Engineering Manager

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