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Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

March 12, 2009

Part 15 UNLICENSED MODULAR TRANSMITTER APPROVAL

ZeroG Wireless, Inc.
FCC ID: W7OZG2100-ZG2101
FCC Part 15 Certification

Gentlemen,

In accordance with DA 00-1407 -26th Jun 2000 "Part 15 Unlicensed Modular Transmitter Approval", ZeroG Wireless Inc. believes it has met all of the requirements set out in that document for the granting of modular approval.

Specifically, the criteria set out in that document are addressed below in **bold**:

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. It is also intended to prevent coupling between the RF circuitry of the module and any wires or circuits in the device into which the module is installed. Such coupling may result in non-compliant operation.

The ZG2100M module has its own shielding covering all components except the integrated antenna. This can be seen in the photographs included in the accompanying test report.

The ZG2101M has its own shielding covering all components except the external antenna connector (JI; COAX CONN UFL-R-SMT). This can be seen in the photographs included in the accompanying test report. Both modules use same PCB, and both modules have identical electrical performance.

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.

No external modulation inputs are provided on the ZG2100M/ZG2101M.

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 ZG2100M/ZG2101M incorporate their own supply regulation which enables them to operate from an external supply voltage of 3.3v +/-15%.

4. The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c). 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 must be approved with the module, either at the time of initial authorization or through Class II permissive change. The “professional installation” provision of Section 15.203 may not be applied to modules.

ZG2100M exercises internal antenna while ZG2101M exercised external antennas.

5. The modular transmitter must be tested in a stand-alone configuration, i.e., the module must not be inside another device during the testing. This is intended to demonstrate that the module is capable of complying with Part 15 emission limits regardless of the device into which it is eventually installed. Unless the transmitter module will be battery powered, it must comply with the AC line conducted requirements found in Section 15.207. AC or DC power lines and data input/output lines connected to the module must not contain ferrites, unless they will be marketed with the module (see Section 15.27(a)). The length of these lines shall be length typical of actual use or, if that length is unknown, at least 10 centimeters 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 shall be unmodified or commercially available (see Section 15.31(i)).

**The device was tested in an open testing in a stand-alone configuration.
The device is battery powered.**

No ferrites were used in the connection of power and data lines to the module during testing. Further, the length of these lines matches the typical length used by customers in the final products.

6. The modular transmitter must 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 must also display a label referring to the enclosed module. This exterior label can use wording such as the following: “Contains Transmitter Module FCC ID: XYZMODEL1” or “Contains FCC ID: XYZMODEL1.” Any similar wording that expresses the same meaning may be used. The Grantee may either provide such a label, an example of which must be included in the application for equipment authorization, or, must provide adequate instructions along with the module which explain this requirement. In the latter case, a copy of these instructions must be included in the application for equipment authorization.

The ZG2100M/Z2101M are fitted with their own labels, including the FCC ID number.

7. The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter and the manufacturer must provide adequate instructions along with the module



to explain any such requirements. A copy of these instructions must be included in the application for equipment authorization. For example, there are very strict operational and timing requirements that must be met before a transmitter is authorized for operation under Section 15.231. For instance, data transmission is prohibited, except for operation Section 15.231(e), in which case there are separate field strength level and timing requirements. Compliance with these requirements must be assured.

The modules have been tested to comply with all rules under Part 15. The compliance is assured by the design of the device and the user is unable to intervene to cause the device to operate incorrectly.

8. The modular transmitter must comply with any applicable RF exposure requirements. For example, FCC Rules Sections 2.1091, 2.1093 and specific Sections of Part 15, including 15.319(i), 15.407(f), 15.253(f) and 15.255(g), require that Unlicensed PCS, UNII and millimeter wave devices perform routine environmental evaluation for RF Exposure to demonstrate compliance. In addition, spread spectrum transmitters operating under Section 15.247 are required to address RF Exposure compliance in accordance with Section 15.247(b)(4). Modular transmitters approved under other Sections of Part 15, when necessary, may also need to address certain RF Exposure concerns, typically by providing specific installation and operating instructions for users, installers and other interested parties to ensure compliance.

Information is included in the test report.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Morrione", written over a horizontal line.

Michael Morrione
VP of Operations
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