

Limited Modular Approval (LMA) Control of End Product Statement

Applicant: LODI Group Holdings PTY LTD

FCC ID: 2BU6D00STELLER

Module Model: Steller 00

Frequency Bands:

- LTE – B1, B2, B3, B4, B5, B8, B12, B13, B14, B18, B19, B20, B25, B26, B28, B66
- Bluetooth Low Energy (BLE), 2.4 GHz

1. Reason for Limited Modular Approval

The Steller 00 RF module does not meet all requirements for Full Modular Approval under 47 CFR §15.212 because its RF and RF exposure compliance depend on the specific host pallet configuration. The module is permanently overmoulded and is not intended for stand-alone operation, user installation, or integration into multiple host devices. As a result, certain modular approval requirements—such as stand-alone testing and independent antenna evaluation—cannot be met without consideration of the final host. For these reasons, Limited Modular Approval (LMA) is requested in accordance with 47 CFR §15.212.

2. Control of the End Product

LODI Group Holdings PTY LTD maintains complete control over the RF module and the end product throughout the entire manufacturing and integration process. The module lifecycle is strictly controlled as follows:

Thailand

The RF module printed circuit board (PCB) is assembled, electrically tested, and provisioned at a LODI-approved manufacturing facility. Only approved firmware versions are loaded, and RF functionality is verified prior to shipment.

Malaysia

The powered and tested module is permanently overmoulded. This process provides mechanical and environmental protection and prevents access to RF circuitry, antenna

connections, or test points. Post-manufacturing modification of RF characteristics is not possible.

Mexico

The overmoulded module is installed exclusively into the approved pallet at a LODI Group Holdings PTY LTD controlled manufacturing warehouse. Installation is performed only by authorized personnel following controlled work instructions.

The module is not sold, distributed, or provided as a standalone device and is never made available to third-party integrators, installers, or end users.

3. Installation Control and Compliance Assurance

LODI Group Holdings PTY LTD retains exclusive control over:

- The host pallet design
- Module installation location and orientation
- Antenna type, placement, and orientation
- Power supply and operating conditions
- Minimum RF exposure separation distance

The antenna is permanently integrated and is not user-replaceable. The pallet design enforces fixed RF parameters and physical separation distances, ensuring compliance with FCC Part 15 and applicable RF exposure requirements. End users have no physical or electrical access to the RF module and no ability to modify RF characteristics or operating configuration.

4. Conclusion

Because LODI Group Holdings PTY LTD maintains full control over module manufacturing, overmoulding, and final installation into the approved pallet host, full compliance of the end product is always ensured. The Steller 00 RF module is compliant with FCC requirements only when installed in the approved pallet configuration, and such installation is performed exclusively under the control of the applicant. Limited Modular Approval is therefore appropriate for this device.

Sincerely,

By:

Head of Technology

Nicholas Heaney



(Signature/Title¹)

(Print name)