

FCC §15.212 Limited Modular Approval

Requirement-by-Requirement Justification

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 (2.4 GHz)

Introduction

This document is submitted in support of an application for Limited Modular Approval (LMA) under 47 CFR §15.212. The Steller 00 RF module is intended for use only within a specific host pallet manufactured and fully controlled by LODI Group Holdings PTY LTD.

Because certain FCC modular approval requirements depend on the final host configuration, including RF exposure, antenna integration, and mechanical enclosure, Limited Modular Approval is requested.

§15.212 Modular Approval Justification Table

FCC §15.212 Requirement	Requirement Description	Justification
RF Shielding	The radio elements of the module should be shielded	The module is permanently overmoulded after electrical test. Overmoulding prevents any access to the RF circuitry. Final RF compliance is ensured through the controlled host pallet design; therefore, Limited Modular Approval is requested.
Buffered Inputs	Data and modulation inputs must be buffered	All inputs are internally buffered and are not accessible after overmoulding and pallet integration.
Power Supply Regulation	Module must comply with power regulation requirements	The module contains onboard power regulation and is powered solely through the approved pallet power system.
Antenna Requirements	Antenna must meet FCC	The antenna is permanently integrated, non-user-

	requirements	replaceable, and fixed within the pallet housing. No antenna substitution is possible.
Stand-Alone Testing	Module should be tested independently	The module relies on the final pallet host for RF and RF exposure compliance. Stand-alone operation is not supported; testing is performed in the final host configuration.
Labeling	FCC ID labeling requirements	The module is not externally accessible. The FCC ID is labeled on the host pallet in accordance with FCC rules for Limited Modular Approval.
Compliance Instructions	Installation instructions must be provided	Installation is performed only by LODI Group Holdings PTY LTD under controlled manufacturing conditions. No third-party installation is permitted.
RF Exposure	RF exposure compliance	RF exposure compliance is evaluated in the final pallet configuration, with fixed separation distance enforced by mechanical design.

Conclusion

The Steller 00 module satisfies the intent of FCC §15.212 through strict control of manufacturing, installation, and host integration. Limited Modular Approval is appropriate because regulatory compliance depends on the specific pallet host configuration, which is fully controlled by the applicant.

Name of Authorized Signatory:

Nicholas Heaney

Date:

16/03/2026

Signature:

