

RITRON, Inc.
505 West Carmel Dr.
Carmel, IN 46032

Timco Engineering, Inc.

December 30, 2003

Re: Modular Approval for AIERIT17-442

To Whom It May Concern:

Ritron is seeking a modular approval for a UHF FM Transceiver covered under Part 90 of the FCC rules, FCC ID: AIERIT17-442. Although the 2000 Public Notice from the FCC concerning modular approval addresses Part 15 devices, we believe that the basic concerns addressed in that notice are applicable to this device. Specifically,

1. “The modular transmitter must have its own shielding.” This device has a shield over the transmitting and radiating circuitry.
2. “The modular transmitter must have buffered modulation/data inputs...” All of the modulation lines are internal to the one PC board used in this device and are buffered by operational amplifiers. No external signal of arbitrary amplitude and frequency can cause the occupied bandwidth and transmitter spurious emissions limits to be exceeded.
3. “The modular transmitter must have its own power supply regulation.” The power supply input voltage passes through at least one stage of power supply regulation and/or limiting before being impressed upon the transmitter stages.
4. “The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c).” This requirement is not applicable since we are requesting a Part 90 rather than a Part 15 approval. Specific antenna requirements do not exist under Part 90 rules.
5. “The modular transmitter must be tested for electromagnetic compatibility in a stand-alone configuration...” This product was tested without any external shielding other than that provided by the shields on the module itself.
6. “The modular transmitter must be labeled with its own FCC ID number...” The FCC ID label is on the module itself and is easily visible. For those applications

where the module may be placed inside another enclosure, specific instructions are included in the Users Manual on the labeling requirements of the enclosure.

7. “The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter...” Specific operating requirements are covered in the Users Manual.
8. “The modular transmitter must comply with any applicable RF exposure requirements.” RF exposure measurements were taken for this device in the modular configuration without any other enclosure.

I trust that Timco will agree that this product meets the requirements for a modular transmitter approval.

Sam L. Dulaney
Chief Engineer
Ritron, Inc.