



Sony Electronics Inc.

One Sony Drive, Park Ridge, New Jersey 07656-8003 Telephone (201) 930-1000

Ms. Diane Poole
Equipment Authorization Branch
Laboratory Division
Office of Engineering & Technology
Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

Re: Application No. EA99330 AK8TA-15A

Dear Ms. Poole,

Pursuant to the procedures set forth in FCC Public Notice DA-1407 (the "Public Notice"), Sony Electronics Inc. on behalf of Sony Corporation, hereby requests Limited Modular Approval ("LMA") for the modular transmitter contained in the device for which the above-referenced application was filed. Sony Corporation wishes to import and market approximately 6000 of these devices, which it has manufactured and labeled. In addition, Sony Corporation wishes to obtain LMA for the modular transmitter contained in the device so it can incorporate it into future devices. Sony Corporation will not sell this transmitter to any other entity and will retain final control over the final installation of the device in order to ensure compliance of the end product with all applicable rules and regulations of the Commission. This letter addresses seriatim the eight requirements set forth in the Public Notice

1. The modular transmitter does not have its own RF shielding. It will rely on the shielding of the device into which it is installed, and Sony Electronics hereby commits to ensure that all devices into which this module is installed comply with all applicable transmission emissions limits.
2. The modular transmitter does not have buffered modulation/data inputs. It has a data input, but the data rate is constant and not modulated and the device complies with applicable FCC requirements under conditions of excessive data rates.
3. The modular transmitter operates on DC12V. It contains a DC-DC converter that supplies regulated voltage to the transmitter unit.
4. The antenna and transmitter unit do not contain specialized couplers not obtainable by ordinary consumers. It also should be noted that the antenna coupler is not accessible to the end user. Sony Electronics will ensure that only this antenna is supplied with this module. This should ensure that the purpose of requirement 4 of the Public Notice is met.
5. The Part 15 test was conducted with the modular transmitter in a stand-alone configuration and without any ferrite cores on DC cable. A 1.5 meter DC cable was used for EMC measurement, and we believe that such length represents typical usage.
6. The modular transmitter will be labeled with its FCC ID number. The LCD Monitor will display a label stating: " Contains FCC ID: AK8TA-15A" on the cabinet. Sony Electronics makes the FCC ID label for both the module and monitor.
7. The transmitter module complies with the requirement of Subpart B of Part 15 of the Commission's rules. The test report for model TA-15A prepared by JQA and filed with the application will confirm the device's compliance with Part 15.
8. As the JQA test report shows, the level of radiated emission from the device which is the subject of the instant application is 61.4 dB uV/m at 3 M (3 meter measurement). The transmitter is not designed to transmit beyond a very short distance. It is designed to transmit from a pen tablet to an LCD monitor with the distance the pen tablet and the monitor being generally no more than 1 cm. Sony Corporation will ensure that the devices into which the modular transmitter is installed will comply with the applicable RF exposure limits contained in Parts 2 and 15 of the Commission's rules.

Sony Corporation very much appreciates the help you have provided it with respect to this application and requests your expedited consideration of this request.

If you have any questions, please contact the undersigned or Steve Kaminer of the Alliance Law Group, our attorneys. He can be reached at (703) 848-8351.

Respectfully yours;

A handwritten signature in black ink, appearing to read 'Julio Posse', with a long horizontal flourish extending to the right.

Julio Posse
Manager
Product Safety & Compliance
Sony Electronics Inc.