



Date: 5 March, 2015

Ref: LMA Compliance Letter

To: Federal Communications Commission

Subject: LMA compliance letter

This letter introduces AeroScout Ltd's request to expand the modular approval of its EX-3300 Exciter according to FCC Limited Modular Approval procedure, and to demonstrate the means to control the module as required by the LMA procedure.

The EX3300 Exciters are specialty designed to be embedded in Hand Hygiene dispenser. When a dispenser with an embedded EX3300 Exciter is activated, the Exciters trigger AeroScout's tags that are located near the Exciter and the tags in turn transmit a message to AeroScout Location Receivers or compatible Access Points in range. This provides instant acknowledgment that a tagged staff member has used the dispenser. The AeroScout Visibility System can detect, record and report the rate of usage of the dispensers per user and provides a revolutionary way for health care facilities to monitor the hand hygiene policy compliance of staff members.

This model is not sold separately, and is not installed in any host units other than the following:

- 1) M/N: 92021188
- 2) M/N: 92021184
- 3) M/N: 92021121
- 4) M/N: 1371-04
- 5) M/N: 1971-04
- 6) M/N: 2720-12
- 7) M/N: 2745-12
- 8) M/N: 2785-12
- 9) M/N: 2845-12

The manufacturer of these host units has been instructed not to use insert the EX-3300 Exciter into any other host unit other than the host units mentioned previously. This instruction appears on page 25 of the user manual.

In any case where the EX-3300 Exciter will be added to other hosts in the future, AeroScout Ltd. will expand the LMA to include the new hosts.

The module incorporates an integral antenna its EIRP does not change between the hosts other than changes created by the host units shape influence.

Due to all the above mentioned, AeroScout Ltd feels that the testing conducted by ITL to the various hosts, with the fact that AeroScout Ltd. markets the EX-3300 Exciter for use only in the hosts submitted in this application and the host manufacturer has been instructed (in the user manual) not to insert the EX-3300 Exciter in any host not included in this application, assure complete compliance with FCC LMA procedure.

As per § 15.212 Modular transmitters:
Single modular transmitters must meet the following requirements to obtain a modular transmitter approval.

Requirement	Not Maintained	Maintained
(1) The radio elements of the modular transmitter must have their own shielding. The physical crystal and tuning capacitors may be located external to the shielded radio elements.	Not maintained	
(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.		Yes
(3) The modular transmitter must have its own power supply regulation.		Yes (battery powered)
(4) The modular transmitter must comply with the antenna and transmission system requirements of §§15.203, 15.204(b) 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). The “professional installation” provision of §15.203 is not applicable to modules but can apply to limited modular approvals under paragraph (b) of this section.		Yes (Internal antenna)

As per § 15.212 Modular transmitters:
Single modular transmitters must meet the following requirements to obtain a modular transmitter approval.

Requirement	Not Maintained	Maintained
(5) The modular transmitter must be tested in a stand-alone configuration, <i>i.e.</i> , the module must not be inside another device during testing for compliance with part 15 requirements. Unless the transmitter module will be battery powered, it must comply with the AC line conducted requirements found in §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 §15.27(a)). The length of these lines shall be the 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 and commercially available (see §15.31(i)).	Module was tested in the host configurations	
(6) The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying its FCC identification number.		Yes
(7) The modular transmitter must comply with any specific rules or operating requirements that ordinarily apply to a complete 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.		Yes
(8) The modular transmitter must comply with any applicable RF exposure requirements in its final configuration.		Yes

Thank you,

Reuven Amsalem

A handwritten signature in blue ink, appearing to be 'RA' with a stylized flourish.

VP HW R&D
AeroScout Ltd.