



July 19, 2006

RE: FCC ID: SJN-CL2-RFID-M1,
Form 731 Confirmation Number: EA955517

Request for LMA Modular Approval

To Whom It May Concern:

In order to obtain a modular transmitter approval, a cover letter requesting modular approval must be submitted and the numbered requirements identified below must be addressed in the application for equipment authorization.

1. The modular transmitter must have its own RF shielding. This is intended to ensure that the module does not have to rely upon the shielding provided by the device into which it is installed in order for all modular transmitter emissions to comply with Part 15 limits. It is also intended to prevent coupling between the RF circuitry of the module and any wires or circuits in the device into which the module is installed. Such coupling may result in non-compliant operation. *The RFID module does not have its own shielding.*
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. *The RFID module does have modulation/data inputs and the CL2 unit does interface to them. See Skyetek Reference Guide and CL2 schematics for details.*
3. The modular transmitter must have its own power supply regulation. This is intended to ensure that the module will comply with Part 15 requirements regardless of the design of the power supplying circuitry in the device into which the module is installed. *The module has its own boost regulator.*
4. The modular transmitter must comply with the antenna requirements of Section 15.203 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). Any antenna used with the module must be approved with the module, either at the time of initial authorization or through a Class II permissive change. The "professional installation" provision of Section 15.203 may not be applied to modules. *The module has an on board internal antenna and will be configured to use it. The antenna is permanently attached.*
5. The modular transmitter must be tested in a stand-alone configuration, i.e., the module must not be inside another device during testing. This is intended to demonstrate that the module is capable of complying with Part 15 emission limits regardless of the device into which it is eventually installed. Unless the transmitter module will be battery powered, it must comply with the AC line conducted requirements found in Section 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 Section 15.27(a)). The length of these lines shall be 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 or commercially available (see Section 15.31(i)). *The module was tested in a stand alone configuration. No power lines or signal lines utilize ferrite beads. The length of the cable provided was longer than 10cm and is unmodified commercially available.*

6. The modular transmitter must be labeled with its own FCC ID number, and, if the FCC ID is not visible when the module is installed inside another device, then the outside of the device into which the module is installed must also display a label referring to the enclosed module. This exterior label can use wording such as the following: "Contains Transmitter Module FCC ID: XYZMODEL1" or "Contains FCC ID: XYZMODEL1." Any similar wording that expresses the same meaning may be used. The Grantee may either provide such a label, an example of which must be included in the application for equipment authorization, or, must provide adequate instructions along with the module which explain this requirement. In the latter case, a copy of these instructions must be included in the application for equipment authorization. *A label for the RFID module will be provided, as well as the FCC ID for it will appear on the outside label for CL2. See attached labels.*

7. The modular transmitter must comply with any specific rule or operating requirements applicable to the 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. For example, there are very strict operational and timing requirements that must be met before a transmitter is authorized for operation under Section 15.231. For instance, data transmission is prohibited, except for operation under Section 15.231(e), in which case there are separate field strength level and timing requirements. Compliance with these requirements must be assured. *The module must be used only with the internal antenna. See Skytek M1 Reference Guide for details. The module must be used only with the boost converter enabled. See Skytek M1 Reference Guide for details.*

8. The modular transmitter must comply with any applicable RF exposure requirements. For example, FCC Rules in Sections 2.1091, 2.1093 and specific Sections of Part 15, including 15.319(i), 15.407(f), 15.253(f) and 15.255(g), require that Unlicensed PCS, UNII and millimeter wave devices perform routine environmental evaluation for RF Exposure to demonstrate compliance. In addition, spread spectrum transmitters operating under Section 15.247 are required to address RF Exposure compliance in accordance with Section 15.247(b)(4). Modular transmitters approved under other Sections of Part 15, when necessary, may also need to address certain RF Exposure concerns, typically by providing specific installation and operating instructions for users, installers and other interested parties to ensure compliance. Field strength levels are below 17microvolts/meter at a distance of 3 meters. There is no RF exposure danger. If compliance with one or more of the numbered requirements, listed above, cannot be demonstrated, it may be possible to obtain a "Limited Modular Approval" (LMA). This will be issued in those instances where the Grantee can demonstrate that it will retain control over the final installation of the device, such that compliance of the end product is assured. In such a case,



an operating condition on the grant of equipment authorization for the module would state that the module is only approved for use when installed in devices produced by a specific manufacturer, typically the Grantee. If LMA is sought, the application for equipment authorization must make this fact clear. It must also specifically state how control of the end product, into which the module will be installed, will be maintained, such that full compliance of the end product is always ensured.

In light of the non-compliance of item 1 above, Visionary Products Inc would like to request an LMA. Visionary Products is the contract manufacturer and design engineers in control of producing the CL2 products. Therefore they have total internal control to produce proper documentation on how to install and use the RFID module in the CL2 products and the ability to supervise and verify that the proper installation steps are taken. This allows Visionary Products Inc. to have total control of how the RFID module will be used.

The grant of equipment authorization for the RFID module should state that the RFID module is approved for use when installed in CL2 units produced by Visionary Products, Inc. If approved, the grant of equipment authorization for a transmitter module will have either the word “module” or “modular” added to the Remarks section on the grant. Absent this specific reference, the authorized device will not be considered an approved transmitter module and its use in any new device would require a separate FCC approval of that device.

Sincerely,

Les Payne
(Agent for Visionary Products)
DNB ENGINEERING, INC.