

Date: 18 September, 2014
Ref: LMA Compliance Letter
To: Federal Communications Commission

Subject: LMA compliance letter

This letter introduces Visonic's request to approve its PG2 RF Module model: RFD according to FCC Limited Modular Approval procedure, and to demonstrate the means to control the module as required by the LMA procedure.

The RFD Transceiver is based on the **CC1110Fx/CC1111Fx**, which is a true low-power sub-1 GHz system-on-chip (SoC) designed for lowpower wireless applications. The

CC1110Fx/CC1111Fx combines the performance of the state-of-the-art RF transceiver **CC1101** with an industry-standard enhanced 8051 MCU, up to 32 kB of in-system programmable flash memory and up to 4 kB of RAM.

This model is not sold separately, and is not installed in any units other than Visonic's products. The module is currently used in the following hosts: Next PG2/Next K9-85 PG2, Next CAM PG2/Next CAM K9-85 PG2 and TOWER-30AM PG2/ TOWER-30AM K9-90 PG2.

In any case where the PG2 RF Module model: RFD will be added to other hosts in the future, Visonic will expand the LMA to include the new hosts.

Since 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, Visonic feels that the testing conducted by ITL to the various hosts, with the fact that Visonic has full control on the sales and installation of the module, 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.	The RFD module is not shielded	
(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.		Using BAT
(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 The RFD Module have integrated antenna



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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)).	The RFD Module always assembled to other host MB (Detector)	
(6) The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying its FCC identification number.	The labels display in MB (Detector)	
(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.	Shows In the manual	
(8) The modular transmitter must comply with any applicable RF exposure requirements in its final configuration.	Tested by ITL in accordance with requirements	



Thank you,

A handwritten signature in blue ink, appearing to read 'Arick Elshtein'. The signature is fluid and stylized, with a large initial 'A'.

Arick Elshtein
Certification Engineer