



Siemens Mobility, Inc.
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September 25, 2023

Via Electronic Mail

American Certification Body, Inc.
313 Park Avenue
Suite 300
Falls Church, VA 22046

Re: Professional Installation – ZRadio SX and F Device; Part Nos.: ZRadio SX: S25442-B58-A2; ZRadio F: S25441-B57-A3.

To Whom it May Concern:

Siemens Mobility, Inc. (“Siemens”) hereby submits this letter in support of its Federal Communications Commission (“FCC”) product certification application (“Application”). Siemens is the manufacturer and supplier of rail infrastructure technology including the ZRadio SX and F Device products (“ZRadio SX and F Device Products”) which are the subject of the instant Application.

In accordance with the *FCC’s Office of Engineering and Technology Laboratory Division Basic Equipment Authorization Guidance for Antennas Used with Part 15 Intentional Radiators* (Ref: KDB 353028 D01) dated March 4, 2022, and in particular, Section II (A)(2)(c)(iii) and (iv) (Professional Installation), Siemens hereby submits the following information:

- **Hardware is Not Readily Available to the Average Consumer.** The ZRadio SX and F Device Products are restricted for industrial rail infrastructure applications only and are not for use by consumers or the general public and are not available for sale to consumers or the general public.
- **Device Is Not Sold Retail or to the General Public.** Siemens as the manufacturer and seller of the ZRadio SX and F Device Products does not sell or market the products to the general public. The ZRadio SX and F Device Products are only marketed to and sold to public transit agencies and sophisticated railroad installation contractors that have the experience and knowledge to install these types of devices that are part of larger complex train control systems.
- **Intended Use is Not for Consumers or General Public.** The ZRadio SX and F Device Products are solely sold for industrial rail infrastructure applications and are not intended for use by consumers or the general public.

- **Sophisticated, Complex, and Specialized Nature of the Equipment.** The ZRadio SX and F Device Products is used for directional transmission and reception of radio telegrams along the railway line. The radio module along with the antenna serves to ensure safe railway operations and thus is required to be installed by professional and knowledgeable installers that are employed by either the public transit agency itself or by sophisticated railroad installation contractors that have the experience and knowledge to install these types of devices that are part of larger complex train control systems.
- **Other Professional Installation Requirements.** Siemens furnishes every public transit agency or sophisticated railroad installation contractor installer of the ZRadio SX and F Device Products a detailed product installation instruction manual which specifically outlines that the devices should be installed by professional installers with proper technical education and expertise and following the specific installation instructions set forth in the manual including that the installation of the Wi-Fi patch antenna must be completed such that a beam angle of about 30° iron-free is maintained. The emission direction should be kept parallel to the signal optics. The antenna vertically mounted with SMA connector.

Should you have any questions regarding this matter or require any further information to process the Application, please feel free to contact me directly at (909) 908-3301.

Sincerely,

Omer Metel
Head of Onboard/Engineering
Siemens Mobility, Inc.

cc: Vishwanath Badiger
Francesco Mantovani
Jason Vogler