



## Modular Approval Request Letter

November 8, 2021

FCC ID: 2AAZF-PIE1X01

Dear Sir or Madam:

*Limited Modular Approval is being requested for RFID module (Model: PIE1X01). The module will be installed only in host systems manufactured by Intuitive Surgical Inc.*

The following paragraphs detail the requirements for modules and explain how the module meets those requirements. Where requirements are not met a justification for a limited modular approval is presented.

### FCC §15.212 Requirements for Single Modular Transmitters

(a) Single modular transmitters consist of a completely self-contained radiofrequency transmitter device that is typically incorporated into another product, host or device. Split modular transmitters consist of two components: a radio front end with antenna (or radio devices) and a transmitter control element (or specific hardware on which the software that controls the radio operation resides). All single or split modular transmitters are approved with an antenna. All of the following requirements apply, except as provided in paragraph (b) of this section.

(1) Single modular transmitters must meet the following requirements to obtain a modular transmitter approval.

(i) 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.

*No. The module does not have its own shielding*

(ii) 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. Data to the modulation circuit is buffered on the module inside component U21 on the schematic (Mfg: STMicroelectronics, Model: CR95HF-VMD5T)*

(iii) The modular transmitter must have its own power supply regulation.

*Yes. The module contains its own power supply regulation and RF reference oscillator is contained within the module. Power supply regulation is provided via pin 32 of U21 on the schematic (Mfg: STMicroelectronics, Model: CR95HF-VMD5T)*

(iv) 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.

*The RFID module is connected to integral PCB-trace, 4-turn loop antenna approximately 10 mm x 10 mm hexagonal shape with truncated corners (approximately 400 nH inductance).*

*Installation instructions for the module explain that only these antennas may be used with the device and that the end user shall not be able to access the antenna port or change antennas.*

(v) The modular transmitter must be tested in a stand-alone configuration, i.e., 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)).

*Test data contained in this application is for the device tested in a stand-alone configuration. Radiated spurious emissions data and AC conducted emissions data demonstrating compliance with the requirements of Part 15 of the FCC rules for intentional radiators and RSS GEN/RSS 210 has been provided.*

(vi) The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying its FCC identification number.

(A) If using a permanently affixed label, the modular transmitter must be labeled with its own FCC identification number, and, if the FCC identification number 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.



(B) If the modular transmitter uses an electronic display of the FCC identification number, the information must be readily accessible and visible on the modular transmitter or on the device in which it is installed. If the module is installed inside another device, then the outside of the device into which the module is installed must display a label referring to the enclosed module. This exterior label can use wording such as the following: "Contains FCC certified transmitter module(s)." Any similar wording that expresses the same meaning may be used. The user manual must include instructions on how to access the electronic display. A copy of these instructions must be included in the application for equipment authorization.

*The module is appropriately labeled (refer to the label and label location drawings contained within this application). Instructions to the end user regarding the labeling requirements for host devices are included in this application.*

(vii) 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.

*The module complies with the specific rules and operating requirements for which certification is sought. Instructions to the OEM installer or end user regarding such requirements for use in host devices are included in this application.*

(viii) The modular transmitter must comply with any applicable RF exposure requirements in its final configuration.

*The module is exempt from RF exposure requirements and can be used at any separation distance from the human body.*

*Best Regards,*

A handwritten signature in black ink, appearing to read "Tony Permsombut".

*Tony Permsombut  
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