

## Alvaro Corrales Sedeño

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**Para:** Iván Del Val Lucia  
**Asunto:** RE: Response to Inquiry to FCC (Tracking Number 622827)

**De:** [oetech@fcc.gov](mailto:oetech@fcc.gov) <[oetech@fcc.gov](mailto:oetech@fcc.gov)>  
**Enviado el:** miércoles, 22 de marzo de 2023 13:23  
**Para:** Iván Del Val Lucia <[ivan.delval@dekra.com](mailto:ivan.delval@dekra.com)>  
**Asunto:** Response to Inquiry to FCC (Tracking Number 622827)

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**Inquiry on 03/15/2023 :**

**Inquiry:**

Dear all,

Hopefully, you are doing well.

I would like to share with you a new enquiry. Our Customer has designed an Ultra-Wideband (UWB) short-range impulse radar sensor module to be used with a Host Device. The module consists of a PCB board with mounted components on one side and the antenna on the other side.

Then, we have two main enquiries:

1. Due to the small size of the module and the fact that the module needs to be mounted in a host device with the antenna on the outside and components and traceability information on the inside it is not possible to affix regulatory marks on the module itself. Novelda therefore requests that these can be provided on the packaging and in the X4F103 data sheet. Please, find enclosed the XF103 Product labelling statement.

Please, could you confirm if based in the manufacturer statement, they are exempted to having to place the model name, the FCC ID and the rest of mandatory labelling requirements on the actual device?

2. The module will be soldered onto a host PCB with antenna facing up and components facing down. Please, find enclosed the X4F103 Shielding statement letter where the manufacturer explain how Complete shielding of the module is achieved by.

Please, could you confirm if you are agree that "full" modular approval is valid?

Do not hesitate to contact me if you need more detailed information.

Thank you in advance for your support.

---Reply from Customer on 03/15/2023---

Hello Again,

I think that something hapenned and only one document was attached.

Let me add the pending one.

Thank you.

### **FCC response on 03/22/2023**

Please see responses below:

Q1: "... not possible to affix regulatory marks on the module itself . . . Please, could you confirm if based in the manufacturer statement, they are exempted to having to place the model name, the FCC ID and the rest of mandatory labelling requirements on the actual device?"

R1: Please consult with FCC KDB guidance 784748 to address your concerns.

Q2: "The module will be soldered onto a host PCB with antenna facing up and components facing down . . . Please, could you confirm if you are agree that "full" modular approval is valid?

R2: Because the module will depend on a host for shielding, certification will be Limited. Please see 15.212(b) and KDBs 996369 with particular attention to D03.

Thank you.

#### **Attachment Details:**

[X4F103 Shielding](#)

[X4F103 Product Labelling](#)

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