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Cambridge  
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UK

## Limited Modular Approval Request

November 04, 2020

Element Materials Technology  
100 Frobisher Business Park  
Leigh Sinton Road  
Malvern  
Worcestershire  
WR14 1BX  
UK

Re: FCC Limited Modular Approval  
FCC ID: 2ASDBMA-0382-5

To Whom It May Concern:

Please be advised that the manufacturer requests that the above-referenced model be approved for Limited Modular Approval in accordance with the FCC Rules and Regulations.

### **Our Product meets the FCC limited modular approval policies in the following ways:**

- I. The radio elements must have the radio frequency circuitry shielded. Physical/discrete and tuning capacitors may be located external to the shield, but must be on the module assembly;  
[The radio frequency circuit is shielded by a screening can fitted to PCB EA-0040-RevP – see SR-0208 Internal Photos.](#)
- II. The module must have buffered modulation/data inputs to ensure that the device will comply with Part 15 requirements with any type of input signal;  
[The data inputs to the module are buffered as part of the TLK105 ethernet PHY. See EA-0023-RevP schematic sheets 1, 6 and 9 in SR-0208 Schematics.](#)
- III. The module must contain power supply regulation on the module;  
[The power supply regulators are affixed to the module in EA-0023-RevP \(schematic sheet 2\) and EA-0010-RevY \(schematic sheet 37\).](#)

- IV. The module must contain a permanently attached antenna, or contain a unique antenna connector, and be marketed and operated only with specific antenna(s), per Sections 15.203, 15.204(b), 15.204(c), 15.212(a), 2.929(b);  
The antenna is permanently attached to PCB EA-0040-RevP – see SR-0208 Internal Photos.
- V. The module must demonstrate compliance in a stand-alone configuration;  
The module is not designed to operate in a stand-alone configuration. Please see the Test Report which includes the test set up photos. MA-0382-5 J8 to J9-11 Assembly is a module containing an RFID reader for use in Versius Instrument Bedside Units only
- VI. The module must be labelled with its permanently affixed FCC ID label, or use an electronic display (See KDB Publication 997198 about labelling requirements);  
See SR-0208 FCC ID Label and Location.
- VII. The module must comply with all specific rules applicable to the transmitter. The grantee must provide comprehensive instructions to explain compliance requirements;  
The RFID reader module meets all the applicable FCC rules. SR-0208 User Manual provides instructions on how to remain compliant with the rules.
- VIII. The module must comply with RF exposure requirements. For any transmitters intended for use in portable devices, SAR compliance must be demonstrated to be independent of the host device. See KDB Publication 447498 Item 2) as a guide to determine if a transmitter can be tested without being limited to a host device. If SAR compliance can only be demonstrated in specific host types or platforms, then the module type must be "limited."  
The RFID module is compliant with all applicable RF exposure requirements. The MA-0382-5 J8 to J9-11 Assembly is a module containing an RFID reader for use in Versius Instrument Bedside Units only. See SR-0208 User Manual section 6.

Yours faithfully,  
CMR Surgical Ltd

DocuSigned by:  
*Chanel Allen-Megahey*  
 Signer Name: Chanel Allen-Megahey  
Signing Reason: I approve this document  
Signing Time: 24-Nov-2020 | 09:43:46 GMT  
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Chanel Allen-Megahey  
Head of Regulatory