August 31st, 2024

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Reference:

Applicant:	Cattron North America Inc.
Equipment:	220MHz Transceiver
Model #:	89696-91071 TRX
FCC ID:	CN289696-91071
IC:	1007A-8969691071

With regard to the Part 15 requirements for modular approval, Cattron North America Inc. would make the following observations with regard to the numbered requirements for the RF module: 89696-91071 TRX (FCC ID: CN2 CN289696-91071, IC ID:1007A-8969691071):

I. The radio elements must have the radio frequency circuitry shielded. –Complies, the module has top and bottom shielding covers.

II. The module must have buffered modulation/data inputs. – The module CPU chip (U1) has buffered modulation and data inputs.

III. The module must contain power supply regulation on the module. - The equipment into which this module is installed is exclusively designed and manufactured by and for Cattron North America Inc. and all have their own regulated and monitored 5.0V supply voltage, excursions of more than +/-5% result in equipment shut down.

IV. The module must contain a permanently attached antenna, or contain a unique antenna connector, and be marketed or operated only with specific antenna(s)-
The permanently attached antenna requirements are met by having third party tested the integral and variants of external antennas as part of the FCC submission.

V. The module must demonstrate compliance in a stand-alone configuration. -
The modular transmitter has been tested in the defined stand-alone configuration.

VI. The module must be labeled with its permanently fixed FCC ID label or use an electronic display. - The Labeling requirements of the modular approvals will be followed, as previously stated the module is only incorporated into Cattron North America Inc. equipment, the label will be installed on the outside of the equipment into which it is incorporated.

VII. Operating parameters are controlled within system requirements specifications, these define the specific voltage tolerance, data rate, deviation and Duty Cycle. Further with regard to Duty Cycle, this is limited to no more than 5%.

VIII. RF exposure limits are maintained by,
a) Limiting power to 1W or less and Duty Cycle to 5%
b) Posting warnings in the operations manual to warn of the possible harmful effects of human exposure to radiation.