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Federal Communications Commission
Equipment Authorization Division, Application Processing Branch
7435 Oakland Mills Road
Columbia, MD21046

RE: PART 15 UNLICENSED MODULAR TRANSMITTER APPROVAL

TO WHOM IT MAY CONCERN

We, INITIUM Co., Ltd., hereby requests for part 15 unlicensed limited modular transmitter approval of our PROMI-ESD01 module, described as follows:

Model name: Promi-ESD01

FCC ID: QOCPROMI-ESD01

In FCC Public Notice DA 00-1407 released June 26,2000 there are eight numbered requirements that our PROMI-ESD01 module complies with.

1. The modular transmitter must have its own shielding.

The radio portion of the module is contained in its own RF shielding. See the external photos.

2. The modular transmitter must have buffered modulation/data inputs

The module has a memory management unit inside of the IC. It buffers the data inputs from UART terminal.

3. The modular transmitter must have its own power supply regulation

The IC contains an own voltage regulation. In case of changes in the supply voltage VCC (for example caused by temperature changes or other effects), the internal voltage will be stabilized.

4. The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204c

The transmitter shall only be used with the tested antenna that has a unique antenna connector, reverse polarity SMA type.

5. The modular transmitter must be tested in a stand-alone configuration

The EUT was tested in a stand-alone configuration. The module was fixed in the Developer Board, Promi-DBS, during the test. See also the test report and Test setup photos.

6. The modular transmitter must be labeled with its own FCC ID number

The EUT will be labeled with its own FCC ID number. The label is specified in Label Information document. If the module is installed inside of an end-product, the label will not be visible. In this case the OEM customer will be instructed to how to apply the exterior label.

7. The modular transmitter must comply with any specific rule or operating requirements

The EUT is compliant with all applicable FCC rules. Detail instructions are given in the product Instruction Manual.

8. The modular transmitter must comply with any applicable RF exposure requirements.

The maximum measured power output is 34.75 mW (15.41 dBm), the maximum antenna gain is 2 dBi = numeric gain 1.6 (acc to FCC test report).

The maximum permissible exposure is defined in 47 CFR 1.1310 with 1 mW/cm².

The maximum permitted level is calculated using the general equation:

$$S = PG/4\pi R^2$$
$$\left(\Rightarrow R = \sqrt{PG/4\pi S}\right)$$

S = power density [mW/cm²]
P = power input to antenna [mW]
G = power gain of the antenna in the direction of interest relative to an isotropic radiator
R = distance to the center of radiation of the antenna [cm]

P = 34.75 mW,

G = 1.6 (numeric gain; +2 dBi = linear power gain relative to the isotropic radiator),

R = 20 cm

Solving for S, the power density at 20 cm is 0.011 mW/cm².

So the 1 mW/cm² limit is kept.

Sincerely,



Je-Kook Ryu / Managing Director

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