



September 17, 2013

Federal Communications Commission
Authorization and Evaluation Division

RE: Limited Modular Approval Request for FCC ID: QYY-51360

To Whom It May Concern:

Nova Biomedical Corporation hereby submits the enclosed application for Equipment Authorization under 47 CFR Part 15.247, Subpart C for Model 51360

1. §15.212 Modular transmitters.

Single modular transmitters must meet the following requirements to obtain a modular transmitter approval. When one or more of the requirements are not met "Limited Modular Approval" can be obtained. The following applies to this module:

(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.

The modular transmitter does not have its own RF shielding. However, the module does not rely upon the shielding provided by the device into which it is installed in order for all modular transmitter emissions to comply with Part 15 emissions limits. Coupling between the RF circuitry of the module and any wires or circuits in the device into which the module is installed that may result in non-compliant operation, will be verified on an end-product basis.

(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.

The module contains buffered data inputs and software is controlled by the manufacturer of the module so that excessive data rates or over modulation will not occur.

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

The radio module incorporates 5.0V power regulation to all radio circuitry.

(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 module contains an antenna that is a permanent part of the Printed Circuit Board and is under control of the manufacturer.



(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)).

The module was tested inside the plastic enclosure of the final product, which does not provide any shielding properties, therefore, the module can be considered to be tested in the stand-alone configuration. This shows that the module is capable of complying with Part 15 emission limits regardless of the device into which it is eventually installed.

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

Upon receipt of this grant, the grant ID will be applied to the device. Instructions for maintaining compliance are provided in documents accompanying the host devices in which the module will be incorporated (Instructions for Use or Service Guide). The module is only approved for use when installed in devices manufactured by Nova Biomedical.

Products which incorporate this device will be labeled "Contains FCC ID: QYY-51360" and their associated Instructions for Use will also advise the user concerning instructions for maintaining compliance.

The module will be labeled with the FCC ID number, and if the FCC ID is not visible when the module is installed inside a device then the outside of the device into which the module is installed will also display a label referring to the enclosed module. Included in our application is an example of this label. Internal documentation regarding the use of this module explains these requirements. As this module will be for use exclusively by the Grantee, we attest that we will retain control of this labeling and ensure this requirement is met on the end use product.

We, the Grantee, attest that we will retain control over the installation of the device in the final product, such that compliance of the end product is assured. The module, Model 51360 is for installation only by Nova Biomedical. Nova Biomedical is responsible for ensuring that the end-user has no manual instructions to remove or install the module.

We, the Grantee, attest that the module is limited to installation in mobile or fixed applications, according to Part 2.1091(b) of the FCC rules.

That separate approval is required for all other operating configurations, including portable configurations with respect to Part 2.1093 and different antenna configurations.

Thank you in advance for your consideration of this application.

Sincerely,

A handwritten signature in dark ink, appearing to read "James S. Sidwell", written over a horizontal line.

Dr. James S. Sidwell
Vice President, Diabetes R&D