



Ubisense Limited, St Andrews House, St Andrews Road, Chesterton, Cambridge CB4 1DL

26 October 2009

Attn: Reviewing Engineer,
Federal Communications Commission,
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Columbia,
MD 21046

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RE: MODULAR UBITAG V2.0HH, FCC ID SEAMOD 21HH
REQUIREMENTS OF FCC PART 15.519(a)

To the Reviewing Engineer:

FCC Part 15.519(a) "Technical Requirements for hand-held UWB systems" states that:

UWB devices operating under the provisions of this section must be hand held, *i.e.*, they are relatively small devices that are primarily hand held while being operated and do not employ a fixed infrastructure.

- (1) A UWB device operating under the provisions of this section shall transmit only when it is sending information to an associated receiver. The UWB intentional radiator shall cease transmission within 10 seconds unless it receives an acknowledgement from the associated receiver that its transmission is being received. An acknowledgment of reception must continue to be received by the UWB intentional radiator at least every 10 seconds or the UWB device must cease transmitting.
- (2) The use of antennas mounted on outdoor structures, *e.g.*, antennas mounted on the outside of a building or on a telephone pole, or any fixed outdoors infrastructure is prohibited. Antennas may be mounted only on the hand held UWB device.
- (3) UWB devices operating under the provisions of this section may operate indoors or outdoors.



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The applicant hereby declares that:

- The Modular Ubitag V2.0HH is a small, hand-held wireless device intended to be used for the real-time location of personnel and hand-held objects (applications include healthcare, workplace productivity, security and retail management), and will be marketed as such.
- The Modular Ubitag V2.0HH User's Guide (see Exhibits) also stresses the requirement for use that is primarily hand-held, and reiterates the technical requirements for hand-held UWB systems listed in §15.519.
- The Modular Ubitag V2.0HH will not transmit ultra-wideband signals unless it receives suitable trigger commands (over a separate §15.249 conventional radio link) from an associated base station. It is programmed to cease transmissions within 10 seconds unless it receives an acknowledgement from an associated receiver that its UWB transmission is being received.
- UWB antennas are mounted only on the Modular Ubitag V2.0HH hand-held UWB device. No antennas mounted on the outside of a building or on a telephone pole, or any fixed outdoors infrastructure are utilized.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Ward'.

Dr Andy Ward
Chief Technology Officer