

December 27, 2024

To Whom It May Concern,

Please be advised that Innovative Wireless Technologies, Inc. is requesting Part 15.247 Unlicensed Digital Modulation approval for its Gateway Node IWT P/N: FAP2213-011 and Fixed Mesh Node, IWT P/N: FAP4213-025. The below statements outline Innovative Wireless Technologies' responses to part 15.203 concerning antennas and professional installation.

A. ANTENNA REQUIREMENTS—Section 15.203

2) c) Professional Installation

- i) Requirement: Professional installation must be justified in the filing, and grant condition must state "This device must be professionally installed."

IWT Response: The GWN and FMN must be professionally installed at the mine site as stated in the product manuals.

- ii) Requirement: Professional installation does not permit use of any antenna with the transmitter; the permitted types of antenna must be specified.

IWT Response: The GWN and FMN product manuals clearly state that the only antennas approved for use with these devices are:

1. ZDA Communications LLC Model ZDADJ928-11YG (Yagi 11 dBi)
2. Hana Wireless Model HW-OD9-5-NF (Omni 6 dBi)
3. Ventev T09170P1000690 (Sector 17 dBi)

These antennas have been tested to comply with FCC EIRP limits.

- iii) The applicant should address the following items when justifying professional installation.

(1) Requirement: To qualify for professional installation, the applicant must explain why the hardware is not readily available to average consumer.

IWT Response: The GWN/FMN devices are not available to the average consumer. These devices are only sold to customers who have also purchased installation services from IWT or have been trained by IWT's professional installers.

(2) Requirement: Marketing—Device cannot be sold via retail to the general public or by mail order; it must be sold to authorized dealers or installers only.

IWT Response: The GWN/FMN devices are not sold via retail to the general public or by mail order. These devices are only sold to customers who have also purchased installation services from IWT or have been trained by IWT's professional installers.

(3) Requirement: Filing must show that intended use is not for consumers and general public; rather device is generally for industrial/commercial use.

IWT Response: The GWN/FMN devices are not intended for consumer or general public use. The devices are for industrial/commercial use only.

(4) Requirement: Explain what is unique, sophisticated, complex, or specialized about the equipment that REQUIRES it to be installed by a professional installer?

IWT Response: The installation of the GWN/FMN requires customized power cabling, configuration of the devices, and testing with specialized tools to operate within an IWT Sentinel™ system.

iv) Other professional installation requirements.

(1) Requirement: Installation must be controlled.

IWT Response: The installation of the GWN and FMN devices is controlled. The devices are typically installed by IWT trained/professional. Alternatively, the devices may be installed by customer professional installers that have been trained by IWT.

(2) Requirement: Installed by licensed professionals (e.g., device sold to dealer who hire installers).

IWT Response: The GWN and FMN devices are typically installed by IWT certified/trained/professional installers. Alternatively, the devices may be installed by customer professional installers that have completed detailed installation training from IWT.

(3) Requirement: Installation requires special training (e.g., special programming, access to keypad, field strength measurements made).

IWT Response: The installation of the GWN/FMN requires special training related to customized power cabling, configuration of the devices, and testing with specialized tools to operate within an IWT Sentinel™ system. Testing includes field strength testing.

Innovative Wireless Technologies, Inc. certifies that the above statements are true to the best of our knowledge. Thank you for your attention to this matter.

Sincerely,



Gary Raulerson
Director of Operations
Innovative Wireless Technologies, Inc