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To whom it may concern:

We, the undersigned, declare that to the best of our knowledge the PAN1440 Bluetooth Module meets each of the criteria outlined in the FCC's DA 00-1407 Modular Transmitter Approval. The criteria (in bold type) and justifications (in normal type) are outlined below.

1. **The modular transmitter must have its own RF shielding. This is intended to ensure that the module does not have to 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 limits. It is also intended to prevent coupling between the RF circuitry of the module and any wires or circuits in the device into which the module is installed. Such coupling may result in non-compliant operation.**

The PAN1440 incorporates its own RF shielding.

2. **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 PAN1440 is a type approved, microcontroller-based module. Ancillary equipment connected to the module does not exert control over modulation techniques nor the frequencies of operation. Digital communication with the module is within data rates defined in the specification of the PAN1440.

3. **The modular transmitter must have its own power supply regulation. This is intended to ensure that the module will comply with Part 15 requirements regardless of the design of the power supplying circuitry in the device into which the module is installed.**

The PAN1440 Module incorporates a 3.3 volt linear regulator.



4. **The modular transmitter must comply with the antenna requirements of Section 15.203 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). Any antenna used with the module must be approved with the module, either at the time of initial authorization or through a Class II permissive change. The “professional installation” provision of Section 15.203 may not be applied to modules.**

The PAN1440 Module features a fixed, integral antenna and has no provision for connection of other antennas.

5. **The modular transmitter must be tested in a stand-alone configuration, i.e., the module must not be inside another device during testing. This is intended to demonstrate that the module is capable of complying with Part 15 emission limits regardless of the device into which it is eventually installed. Unless the transmitter module will be battery powered, it must comply with the AC line conducted requirements found in Section 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 Section 15.27(a)). The length of these lines shall be 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 or commercially available (see Section 15.31(i)).**

The module provided for approval is in a stand-alone configuration: ancillary equipment has only been provided to facilitate testing (by incorporation of commercially available RS232 drivers for easy connection to a serial port). The unit is a low voltage, d.c. device, not intended for connection to a.c. supplies. Connection to the PAN1440 Module is via fixed length pins, and is intended to be surface mounted or accommodated by vias in the system's printed circuit board.

6. **The modular transmitter must be labeled with its own FCC ID number, and, if the FCC ID is not visible when the module is installed inside another device, then the outside of the device into which the module is installed must also display a label referring to the enclosed module. This exterior label can use wording such as the following: “Contains Transmitter Module FCC ID: XYZMODEL1” or “Contains FCC ID: XYZMODEL1.” Any similar wording that expresses the same meaning may be used. The Grantee may either provide such a label, an example of which must be included in the application for equipment authorization, or, must provide adequate instructions along with the module which explain this requirement. In the latter case, a copy of these instructions must be included in the application for equipment authorization.**

A label containing the text “FCC ID:”, the Grantee Code and the Equipment Product



Code "BT001" will be affixed centrally on the underside of the module (there is no room on the top side of the module to affix this label). The containing equipment will bear the marking "Contains FCC ID:", followed by the Grantee and Equipment Product code of the module.

7. **The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter and the manufacturer must provide adequate instructions along with the module to explain any such requirements. A copy of these instructions must be included in the application for equipment authorization. For example, there are very strict operational and timing requirements that must be met before a transmitter is authorized for operation under Section 15.231. For instance, data transmission is prohibited, except for operation under Section 15.231(e), in which case there are separate field strength level and timing requirements. Compliance with these requirements must be assured.**

The PAN1440 has passed the Bluetooth Qualification Program and therefore found to meet the operating and timing requirements therein. Transmission parameters are not under the control of the system into which the module is integrated. Overall operation of the PAN1440 module will be validated by FCC part 15 tests performed at the TCB test house.

8. **The modular transmitter must comply with any applicable RF exposure requirements. For example, FCC Rules in Sections 2.1091, 2.1093 and specific Sections of Part 15, including 15.319(i), 15.407(f), 15.253(f) and 15.255(g), require that Unlicensed PCS, UNII and millimeter wave devices perform routine environmental evaluation for RF Exposure to demonstrate compliance. In addition, spread spectrum transmitters operating under Section 15.247 are required to address RF Exposure compliance in accordance with Section 15.247(b)(5). Modular transmitters approved under other Sections of Part 15, when necessary, may also need to address certain RF Exposure concerns, typically by providing specific installation and operating instructions for users, installers and other interested parties to ensure compliance.**

Overall operation of the PAN1440 module will be validated by FCC part 15 tests performed at the TCB test house.

Sincerely,

Ian Evans  
Engineering Manager  
Able Systems Limited