

May 1, 2007

Chief, Authorizations Branch
Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

Subject: Request for unlicensed Modular Transmitter Approval.

Reference: FCC 07-56A1 47 CFR 15.212

To Whom It May Concern:

Alereon, Inc. hereby requests FCC Equipment Authorization as a Singular Modular Transmitter of the Alereon Model AL4512 UWB Module, FCC ID U9YAL4512. Alereon intends to manufacture this device and market it under several brand names and brand I.D.s as a computer accessory, it is not intended to be built into an item of equipment. This letter addresses the information required by points one through eight of 47 CFR 15.212.

1. The modular transmitter must have its own RF shielding. All shielding necessary for normal operation is accomplished by the multi-layer construction of the printed wiring board which incorporates multiple ground layers in its construction. As this transmitter is designed to operate stand-alone in its own enclosure, connected to industry-standard USB interfaces, no additional shielding is incorporated to minimize coupling such as may occur if the module were incorporated into another unit.
2. The modular transmitter must have buffered modulation/data inputs. The Alereon AL4512 UWB Module receives data via the industry-standard USB 2.0 interface. This USB interface is implemented within the UPD720180 integrated circuit as may be seen on sheets four through seven of the schematic diagram included in the filing for FCC Equipment Authorization. The USB interface limits the data rate to those defined by the USB standard.
3. The modular transmitter must have its own power supply regulation. The Alereon AL4512 UWB Module receives power from an external +5 volt power unit. This +5 Volt source is regulated on the module to produce the three power domains required by the module circuitry; +3.3V, +1.5V and +1.2V. The power regulation topology may be seen on sheets fourteen and fifteen of the schematic diagram included in the filing for FCC Equipment Authorization.
4. The modular transmitter antenna must comply with the antenna and transmission system requirements of sections 15.203 and 15.204(c). The antenna of the Alereon AL4512 UWB Module is an external monopole which attaches to the AL4512 by a

Reverse – Polarity SMA connector. This connector complies with the requirement of FCC 15.203 for a unique coupling.

5. The modular transmitter must be tested in a stand-alone configuration. As described in section 2.6.3 of the test report included in the filing for FCC Equipment Authorization, the AL4512 UWB Module was tested without a plastic housing, connected to the USB port of a P.C. and with a USB device and three terminated USB cables connected. This arrangement of the unit, cables and device represents the security association configuration and has the maximum number of cables connected to maximize the emissions potential of the unit. The AL4512 is designed with an industry standard USB Type-B connector as its electrical and mechanical interface to the host system and with industry standard USB Type-A connectors as its electrical and mechanical interface to attached devices this limits potential attachments to the types used in the test.

6. The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying its FCC identification number. The Alereon AL4512 UWB Module is intended to be placed within a plastic enclosure unique to the brand I.D. under which it is being marketed. The prescribed label with the FCC Identifier will be applied to the outside of the housing. An example of the label which will be used is included in the filing for FCC Equipment Authorization.

7. The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter. Part 15.519 of the FCC rules and Regulations requires that a UWB transmitter shall transmit only when it is sending information to an associated receiver. That rules part also requires that 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. This requirement is met by design and is implemented by the firmware encoded into the device.

8. The modular transmitter must comply with any applicable RF exposure requirements in its final configuration. There are no RF exposure requirements for hand-Held UWB devices operating under subpart F of the FCC Rules and Regulations.



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