

Date: November 21, 2010
Ref: LMA Compliance Letter
To: Federal Communications Commission

Subject: LMA compliance letter

This letter introduces ORPAK Systems Ltd request to approve it's WGT wireless RF module according to FCC Limited Modular Approval procedure, and to demonstrate the means to control the module as required by the LMA procedure.

The module WGT, (p/n 819539300 & (two) p/n 819539370) is a 2.4 GHz wireless module manufactured by ORPAK Systems Ltd. The model consists of a "PCB ASSY. WGT CPU (VIS)" and two headers for connection to both "PCB ASSY WGT RF-3 (AT)" and each one of RF boards has its own integrated onboard antenna.

This model is not sold separately, and is not installed in any units other then ORPAK's Products, and currently it is used in the following hosts: MWGT (P/N 800939300), MWGT OUTDOOR UNIT – Universal (P/N 8009393610, OrIC (P/N 800938050), and OrIC8 (P/N 800941505). MWGT (P/N 800939300) and MWGT OUTDOOR UNIT – Universal (P/N 8009393610) have various model names which are identical electronically, physically, and mechanically to the MWGT and MWGT OUTDOOR UNIT – Universal respectively. Both the OrIC and OrIC8 have various sub-configurations which differ from the main host only by software and/or extracted components/assemblies. See Orpak Systems declarations concerning additional MWGT, MWGT OUTDOOR UNIT – Universal, OrIC and OrIC8 model variations.

1) Following is the list of MWGT P/N 800939300 model names:

| Product P/N | Product Name |
|-------------|-----------------|
| 800939301 | MWGT UNIT |
| 800939302 | WGT UNIT W/P.S. |
| 800939305 | CWGT UNIT |

2) Following is the list of MWGT OUTDOOR UNIT UL-W/P.S.
P/N 800939355 model names:

| Product P/N | Product Name |
|-------------|--------------------------------|
| 800939350 | WGT OUTDOOR UNIT UL |
| 800939351 | MWGT OUTDOOR UNIT (GB) |
| 800939352 | CWGT OUTDOOR UNIT UL-W/P.S. |
| 800939353 | WGT OUTDOOR UNIT UL-W/P.S. |
| 800939355 | MWGT OUTDOOR UNIT UL-W/P.S. |
| 800939356 | MWGT OUTDOOR UNIT (GB-W/O P.S) |
| 800939360 | WGT OUTDOOR UNIT-UNIVERSAL |
| 800939362 | CWGT OUTDOOR UNIT-UNIVERSAL |
| 800939363 | WGT ORTC OUTDOOR |
| 800939364 | WGT ORTC (GB) OUTDOOR |
| 800939365 | MWGT ORTC OUTDOOR |
| 800939366 | MWGT ORTC (GB) OUTDOOR |

3) Following is the list of OrIC, P/N 8009380850, model variations.

| <i>OrIC/OrIT Main Configurations for FCC</i> | |
|---|---------------|
| P/N | Product Name |
| 800938102 | OrIT (E) |
| 800938103 | OrIC (E) |
| 800938104 | OrIT (2M) |
| 800938105 | OrIC (2M) |
| 800938106 | OrIT (4M) |
| 800938107 | OrIC (4M) |
| 800938118 | OrIT (E,WGT) |
| 800938119 | OrIC (E,WGT) |
| 800938120 | OrIT (2M,WGT) |
| 800938121 | OrIC (2M,WGT) |
| 800938122 | OrIT (4M,WGT) |
| 800938123 | OrIC (4M,WGT) |
| 800938134 | OrIT (E,PRN) |
| 800938135 | OrIC (E,PRN) |
| 800938136 | OrIT (2M,PRN) |
| 800938137 | OrIC (2M,PRN) |
| 800938138 | OrIT (4M,PRN) |
| 800938139 | OrIC (4M,PRN) |

| <i>OrIC/OrIT Main Configurations for FCC</i> | |
|--|-----------------------|
| P/N | Product Name |
| 800938150 | OrIT (E,WGT,PRN) |
| 800938151 | OrIC (E,WGT,PRN) |
| 800938152 | OrIT (2M,WGT,PRN) |
| 800938153 | OrIC (2M,WGT,PRN) |
| 800938154 | OrIT (4M,WGT,PRN) |
| 800938155 | OrIC (4M,WGT,PRN) |
| 800938166 | OrIT (E,DK) |
| 800938167 | OrIC (E,DK) |
| 800938168 | OrIT (2M, DK) |
| 800938169 | OrIC (2M, DK) |
| 800938170 | OrIT (4M, DK) |
| 800938171 | OrIC (4M, DK) |
| 800938182 | OrIT (E,WGT,DK) |
| 800938183 | OrIC (E,WGT,DK) |
| 800938184 | OrIT (2M, WGT,DK) |
| 800938185 | OrIC (2M, WGT,DK) |
| 800938186 | OrIT (4M, WGT,DK) |
| 800938187 | OrIC (4M,WGT, DK) |
| 800938198 | OrIT (E,PRN,DK) |
| 800938199 | OrIC (E, PRN,DK) |
| 800938200 | OrIT (2M, PRN,DK) |
| 800938201 | OrIC (2M, PRN,DK) |
| 800938202 | OrIT (4M, PRN,DK) |
| 800938203 | OrIC (4M, PRN,DK) |
| 800938214 | OrIT (E,WGT,PRN,DK) |
| 800938215 | OrIC (E,WGT,PRN,DK) |
| 800938216 | OrIT (2M,WGT,PRN,DK) |
| 800938217 | OrIC (2M,WGT,PRN,DK) |
| 800938218 | OrIT (4M,WGT,PRN,DK) |
| 800938219 | OrIC (4M,WGT,PRN, DK) |
| 800938358 | OrIT (O,E) |
| 800938359 | OrIC (O,E) |
| 800938360 | OrIT (O,2M) |
| 800938361 | OrIC (O,2M) |
| 800938362 | OrIT (O,4M) |
| 800938363 | OrIC (O,4M) |

| <i>OrIC/OrIT Main Configurations for FCC</i> | |
|--|---------------------|
| P/N | Product Name |
| 800938374 | OrIT (O,E,WGT) |
| 800938375 | OrIC (O,E,WGT) |
| 800938376 | OrIT (O,2M,WGT) |
| 800938377 | OrIC (O,2M,WGT) |
| 800938378 | OrIT (O,4M,WGT) |
| 800938379 | OrIC (O,4M,WGT) |
| 800938390 | OrIT (O,E,PRN) |
| 800938391 | OrIC (O,E,PRN) |
| 800938392 | OrIT (O,2M,PRN) |
| 800938393 | OrIC (O,2M,PRN) |
| 800938394 | OrIT (O,4M,PRN) |
| 800938395 | OrIC (O,4M,PRN) |
| 800938406 | OrIT (O,E,WGT,PRN) |
| 800938407 | OrIC (O,E,WGT,PRN) |
| 800938408 | OrIT (O,2M,WGT,PRN) |
| 800938409 | OrIC (O,2M,WGT,PRN) |
| 800938410 | OrIT (O,4M,WGT,PRN) |
| 800938411 | OrIC (O,4M,WGT,PRN) |
| 800938422 | OrIT (O,E,DK) |
| 800938423 | OrIC (O,E,DK) |
| 800938424 | OrIT (O,2M, DK) |
| 800938425 | OrIC (O,2M, DK) |
| 800938426 | OrIT (O,4M, DK) |
| 800938427 | OrIC (O,4M, DK) |
| 800938438 | OrIT (O,E,WGT,DK) |
| 800938439 | OrIC (O,E,WGT,DK) |
| 800938440 | OrIT (O,2M, WGT,DK) |
| 800938441 | OrIC (O,2M, WGT,DK) |
| 800938442 | OrIT (O,4M, WGT,DK) |
| 800938443 | OrIC (O,4M,WGT, DK) |
| 800938454 | OrIT (O,E,PRN,DK) |
| 800938455 | OrIC (O,E, PRN,DK) |
| 800938456 | OrIT (O,2M, PRN,DK) |
| 800938457 | OrIC (O,2M, PRN,DK) |
| 800938458 | OrIT (O,4M, PRN,DK) |
| 800938459 | OrIC (O,4M, PRN,DK) |

| <i>OrIC/OrIT Main Configurations for FCC</i> | |
|---|---------------------------|
| P/N | Product Name |
| 800938470 | OrIT (O,E,WGT,PRN,DK) |
| 800938471 | OrIC (O,E,WGT,PRN,DK) |
| 800938472 | OrIT (O,2M,WGT,PRN,DK) |
| 800938473 | OrIC (O,2M,WGT,PRN,DK) |
| 800938474 | OrIT (O,4M,WGT,PRN,DK) |
| 800938475 | OrIC (O,4M,WGT,PRN, DK) |
| 800938050 | ORPAK ISLAND CONT,ORIC UL |

4) Following is the list of OrIC8, P/N 800941505, model variations.

| <i>OrIC 8/ OrIT 8 Main Configurations for FCC</i> | |
|--|-----------------|
| P/N | Name |
| 800941002 | OrIT 8 (E) |
| 800941003 | OrIC 8 (E) |
| 800941004 | OrIT 8 (2M) |
| 800941005 | OrIC 8 (2M) |
| 800941006 | OrIT 8 (4M) |
| 800941007 | OrIC 8 (4M) |
| 800941008 | OrIT 8 (8M) |
| 800941009 | OrIC 8 (8M) |
| 800941018 | OrIT 8 (E,WGT) |
| 800941019 | OrIC 8 (E,WGT) |
| 800941020 | OrIT 8 (2M,WGT) |
| 800941021 | OrIC 8 (2M,WGT) |
| 800941022 | OrIT 8 (4M,WGT) |
| 800941023 | OrIC 8 (4M,WGT) |
| 800941024 | OrIT 8 (8M,WGT) |
| 800941025 | OrIC 8 (8M,WGT) |
| 800941034 | OrIT 8 (E,PRN) |
| 800941035 | OrIC 8 (E,PRN) |
| 800941036 | OrIT 8 (2M,PRN) |
| 800941037 | OrIC 8 (2M,PRN) |
| 800941038 | OrIT 8 (4M,PRN) |
| 800941039 | OrIC 8 (4M,PRN) |
| 800941040 | OrIT 8 (8M,PRN) |
| 800941041 | OrIC 8 (8M,PRN) |

OrIC 8/ OrIT 8 Main Configurations for FCC

| P/N | Name |
|------------|------------------------|
| 800941050 | OrIT 8 (E,WGT,PRN) |
| 800941051 | OrIC 8 (E,WGT,PRN) |
| 800941052 | OrIT 8 (2M,WGT,PRN) |
| 800941053 | OrIC 8 (2M,WGT,PRN) |
| 800941054 | OrIT 8 (4M,WGT,PRN) |
| 800941055 | OrIC 8 (4M,WGT,PRN) |
| 800941056 | OrIT 8 (8M,WGT,PRN) |
| 800941057 | OrIC 8 (8M,WGT,PRN) |
| 800941066 | OrIT 8 (E,DK) |
| 800941067 | OrIC 8 (E,DK) |
| 800941068 | OrIT 8 (2M, DK) |
| 800941069 | OrIC 8 (2M, DK) |
| 800941070 | OrIT 8 (4M, DK) |
| 800941071 | OrIC 8 (4M, DK) |
| 800941072 | OrIT 8 (8M, DK) |
| 800941073 | OrIC 8 (8M, DK) |
| 800941082 | OrIT 8 (E,WGT,DK) |
| 800941083 | OrIC 8 (E,WGT,DK) |
| 800941084 | OrIT 8 (2M, WGT,DK) |
| 800941085 | OrIC 8 (2M, WGT,DK) |
| 800941086 | OrIT 8 (4M, WGT,DK) |
| 800941087 | OrIC 8 (4M,WGT, DK) |
| 800941088 | OrIT 8 (8M, WGT,DK) |
| 800941089 | OrIC 8 (8M,WGT, DK) |
| 800941098 | OrIT 8 (E,PRN,DK) |
| 800941099 | OrIC 8 (E, PRN,DK) |
| 800941100 | OrIT 8 (2M, PRN,DK) |
| 800941101 | OrIC 8 (2M, PRN,DK) |
| 800941102 | OrIT 8 (4M, PRN,DK) |
| 800941103 | OrIC 8 (4M, PRN,DK) |
| 800941104 | OrIT 8 (8M, PRN,DK) |
| 800941105 | OrIC 8 (8M, PRN,DK) |
| 800941114 | OrIT 8 (E,WGT,PRN,DK) |
| 800941115 | OrIC 8 (E,WGT,PRN,DK) |
| 800941116 | OrIT 8 (2M,WGT,PRN,DK) |
| 800941117 | OrIC 8 (2M,WGT,PRN,DK) |

OrIC 8/ OrIT 8 Main Configurations for FCC

| P/N | Name |
|------------|-------------------------|
| 800941118 | OrIT 8 (4M,WGT,PRN,DK) |
| 800941119 | OrIC 8 (4M,WGT,PRN, DK) |
| 800941120 | OrIT 8 (8M,WGT,PRN,DK) |
| 800941121 | OrIC 8 (8M,WGT,PRN, DK) |
| 800941258 | OrIT 8 (O,E) |
| 800941259 | OrIC 8 (O,E) |
| 800941260 | OrIT 8 (O,2M) |
| 800941261 | OrIC 8 (O,2M) |
| 800941262 | OrIT 8 (O,4M) |
| 800941263 | OrIC 8 (O,4M) |
| 800941264 | OrIT 8 (O,8M) |
| 800941265 | OrIC 8 (O,8M) |
| 800941274 | OrIT 8 (O,E,WGT) |
| 800941275 | OrIC 8 (O,E,WGT) |
| 800941276 | OrIT 8 (O,2M,WGT) |
| 800941277 | OrIC 8 (O,2M,WGT) |
| 800941278 | OrIT 8 (O,4M,WGT) |
| 800941279 | OrIC 8 (O,4M,WGT) |
| 800941280 | OrIT 8 (O,8M,WGT) |
| 800941281 | OrIC 8 (O,8M,WGT) |
| 800941290 | OrIT 8 (O,E,PRN) |
| 800941291 | OrIC 8 (O,E,PRN) |
| 800941292 | OrIT 8 (O,2M,PRN) |
| 800941293 | OrIC 8 (O,2M,PRN) |
| 800941294 | OrIT 8 (O,4M,PRN) |
| 800941295 | OrIC 8 (O,4M,PRN) |
| 800941296 | OrIT 8 (O,8M,PRN) |
| 800941297 | OrIC 8 (O,8M,PRN) |
| 800941306 | OrIT 8 (O,E,WGT,PRN) |
| 800941307 | OrIC 8 (O,E,WGT,PRN) |
| 800941308 | OrIT 8 (O,2M,WGT,PRN) |
| 800941309 | OrIC 8 (O,2M,WGT,PRN) |
| 800941310 | OrIT 8 (O,4M,WGT,PRN) |
| 800941311 | OrIC 8 (O,4M,WGT,PRN) |
| 800941312 | OrIT 8 (O,8M,WGT,PRN) |
| 800941313 | OrIC 8 (O,8M,WGT,PRN) |

OrIC 8/ OrIT 8 Main Configurations for FCC

| P/N | Name |
|------------|---------------------------|
| 800941322 | OrIT 8 (O,E,DK) |
| 800941323 | OrIC 8 (O,E,DK) |
| 800941324 | OrIT 8 (O,2M, DK) |
| 800941325 | OrIC 8 (O,2M, DK) |
| 800941326 | OrIT 8 (O,4M, DK) |
| 800941327 | OrIC 8 (O,4M, DK) |
| 800941328 | OrIT 8 (O,8M, DK) |
| 800941329 | OrIC 8 (O,8M, DK) |
| 800941338 | OrIT 8 (O,E,WGT,DK) |
| 800941339 | OrIC 8 (O,E,WGT,DK) |
| 800941340 | OrIT 8 (O,2M, WGT,DK) |
| 800941341 | OrIC 8 (O,2M, WGT,DK) |
| 800941342 | OrIT 8 (O,4M, WGT,DK) |
| 800941343 | OrIC 8 (O,4M,WGT, DK) |
| 800941344 | OrIT 8 (O,8M, WGT,DK) |
| 800941345 | OrIC 8 (O,8M,WGT, DK) |
| 800941354 | OrIT 8 (O,E,PRN,DK) |
| 800941355 | OrIC 8 (O,E, PRN,DK) |
| 800941356 | OrIT 8 (O,2M, PRN,DK) |
| 800941357 | OrIC 8 (O,2M, PRN,DK) |
| 800941358 | OrIT 8 (O,4M, PRN,DK) |
| 800941359 | OrIC 8 (O,4M, PRN,DK) |
| 800941360 | OrIT 8 (O,8M, PRN,DK) |
| 800941361 | OrIC 8 (O,8M, PRN,DK) |
| 800941370 | OrIT 8 (O,E,WGT,PRN,DK) |
| 800941371 | OrIC 8 (O,E,WGT,PRN,DK) |
| 800941372 | OrIT 8 (O,2M,WGT,PRN,DK) |
| 800941373 | OrIC 8 (O,2M,WGT,PRN,DK) |
| 800941374 | OrIT 8 (O,4M,WGT,PRN,DK) |
| 800941375 | OrIC 8 (O,4M,WGT,PRN, DK) |
| 800941376 | OrIT 8 (O,8M,WGT,PRN,DK) |
| 800941377 | OrIC 8 (O,8M,WGT,PRN, DK) |

In any case where the WGT will be added to other hosts in the future, ORPAK will expand the LMA to include the new hosts.

Since the module incorporates an integral antenna its EIRP does not change between the hosts other than changes created by the host units shape influence.

Due to all the above mentioned, ORPAK Systems Ltd feels that the testing conducted by ITL to the various hosts, with the fact that ORPAK have full control on the sales and installation of the module, assure complete compliance with FCC LMA procedure.

| As per § 15.212 Modular transmitters: Single modular transmitters must meet the following requirements to obtain a modular transmitter approval. | | |
|--|--|---|
| Requirement | Not Maintained | Maintained |
| (1) 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. | WGT's Transmitters do not have their own 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. | WGT's transmitters do not have buffered modulation /data inputs. | |
| (3) The modular transmitter must have its own power supply regulation. | | WGT's modular transmitters have their own power supply regulation via 819539300 PCB ASSY. WGT CPU (VIS): |

As per § 15.212 Modular transmitters:

Single modular transmitters must meet the following requirements to obtain a modular transmitter approval.

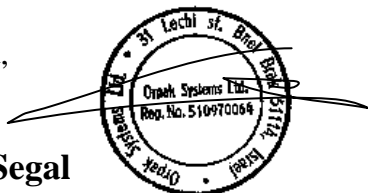
| Requirement | Not Maintained | Maintained |
|---|---|---|
| <p>(4) The modular transmitter must comply with the antenna and transmission system requirements of §§15.203, 15.204(b) and 15.204(c). The antenna must either be permanently attached or employ a “unique” antenna coupler (at all connections between the module and the antenna, including the cable).</p> <p>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.</p> | <p>Since the module incorporates an integral antenna its EIRP does not change between the hosts other than changes created by the host units shape influence.</p> | <p>WGT's transmitter's antennas are permanently attached. Each one of the two "PCB ASSY WGT RF-3 (AT)" has its own integrated onboard antenna.</p> |
| <p>(5) The modular transmitter must be tested in a stand-alone configuration, <i>i.e.</i> , 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)).</p> | | <p>The unit was fully tested in a specific host which was powered from AC. AC line conducted emission (15.207) was performed on the above configuration</p> |

As per § 15.212 Modular transmitters:

Single modular transmitters must meet the following requirements to obtain a modular transmitter approval.

| Requirement | Not Maintained | Maintained |
|---|----------------|--|
| (6) The modular transmitter must be equipped with either a permanently affixed label or must be capable of electronically displaying its FCC identification number. | | WGT's modular transmitter is equipped with a permanently affixed label |

Signed,



Gidi Segal

Quality Assurance Director

Orpak Systems Ltd.