March 26, 2013

Federal Communications Commission

7435 Oakland Mills Road

Columbia MD 21046

Subject: **Limited Modular Approval**

FCC ID: FCC ID WCG [WCGP5T3P]

Dear Sir/Madam:

Enclosed please find the Modular Approval checklist. We are seeking limited modular approval on that basis that the product meets all requirements when used in the prescribed manner as indicated in the End Product Control section.

Should you have any questions, please feel free to contact the undersigned.

Sincerely,

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Modular Approval Checklist

Modular approval requirement	Yes	No
(a) The radio elements must have the radio frequency circuitry must be shielded. Physical/discrete and tuning capacitors may be located external to the shield, but must be on the module assembly.		No See Note 1
(b) The module shall have buffered modulation/data input(s) (if such inputs are provided) to ensure that the module will comply with the requirements set out in the applicable RSS standard under conditions of excessive data rates or over-modulation.	Yes	
(c) The module shall have its own power supply regulation on the module. This is to ensure that the module will comply with the requirements set out in the applicable standard regardless of the design of the power supplying circuitry in the host device which houses the module.	Yes	
(d) The module shall comply with the provisions for external power amplifiers and antennas detailed in this standard. The equipment certification submission shall contain a detailed description of the configuration of all antennas that will be used with the module.	Yes	
(e) The module shall be tested for compliance with the applicable standard in a stand-alone configuration, i.e. the module must not be inside another device during testing.	Yes	
(f) The module shall comply with the Category I equipment labeling requirements.	Yes	
g) The module shall comply with applicable RSS-102 exposure requirements, which are based on the intended use/configurations.	Yes	
(h) Is the modular device for an Industry Canada licensed exempt service?	Yes	

Note 1 :

The PMM, including all radio components, is permanently enclosed in a highly impact resistant Lexan enclosure. Modules are sold for installation into a specific class of devices known as Power Distribution Units ("PDUs"), which are industrial-grade metal multi-outlet “power strips”. All PDU-type devices have to be completely grounded for safety reasons. The module is always installed in devices with grounded metal enclosures, with a metal front plate with only the antenna (permanently enclosed in Lexan) protruding through the plane of the front plate. All radio components of the PMM are contained within

the metal enclosure. The module is permanently installed under strict guidelines by highly qualified OEMs who can acquire modules only directly from Packet Power.

Additional installations of the product always utilize similar installation requirements with the device housed in a grounded chassis, with only the antenna (enclosed in Lexan) protruding from the device. Radio components of the device are contained within the metal enclosure. Any installation takes place under strict guidelines by highly qualified OEMs who can acquire modules only directly from Packet Power.

For additional details please see the separate document : Packet Power PMM – RF Shielding.pdf,

End Product Control (Section 3.2.3 of RSS-Gen)

The Packet Power PMM module is used within Power Distribution Units (PDUs) such as those manufactured by Geist Manufacturing and others. All PDU devices are housed within grounded sheet metal enclosures for mechanical integrity and safety reasons. The Packet Power PMM module is installed within the metal enclosure of the PDU, with only the antenna (permanently enclosed in Lexan) protruding through the plane of enclosure. All radio components of the PMM are contained within the enclosure. The module is permanently installed under strict guidelines by highly qualified OEMs who can acquire modules only directly from Packet Power.

In order for the PMM module to be used within a PDU, the PDU manufacturer must collaborate closely with Packet Power, including determining the exact way in which the module will be mounted within the PDU and the optimum way for the PMM to be incorporated into the PDU's wiring. Each PMM has a unique serial number, which when used with the configuration utility provides full traceability of each module.

Further, the end product manufacturers' PDU products must meet UL/ANSI and IC safety certification criteria, including the appropriate installation of our monitoring module within a properly grounded enclosure. This provides an additional compliance requirement that is administered by an independent party on an ongoing basis. The PMM module will only be deployed in products that are themselves subject to strict safety certification and are built using manufacturing processes subject to ongoing monitoring.