

FCC ID: X4USPC
Exhibit 11: Attestation Statement - Limited Split Modular

As can be seen on the attached block diagram, schematics and photos, the Limited Split Modular transmitters consist of two components: A radio transmitter module mounted on the mother board close to the antenna functioning as the RF front-end and a microcontroller (MCU) on the mother board hosting the software that controls the radio operation via serial communications.

The Limited Split Modular transmitter has been tested installed in a host device similar to the platform intended for use. See attached Test Report for compliance with FCC 15.231.

The following items demonstrate that by complying with the requirements of 15.212 or by alternative means, the Limited Split Modular transmitter meets all the applicable part 15 requirements under the operating conditions in which the transmitter will be used:

- a. Shielding - a solid ground plane on the bottom layer of the RF module serves as shield. The DUT passed all spurious emission tests.
- b. Buffered modulation/data input – Excessive data rates or over-modulation cannot be applied because the firmware memory on the MCU that controls these parameters is read/write protected.
- c. Power supply regulation: The device operates from two AA batteries providing voltage in the range 1.9 - 3.2Vdc. A DC to DC converter/Regulator regulates the power supply to 3.3Vdc. Regulated power supply is applied to the entire circuit including the RF Module and the MCU.
- d. Signaling amplitude: The logic signal level of the communications interface between the MCU and the radio module is fixed at 3.3V

The full compliance of the end product is always ensured due to the following:

1. The radio transmitter module is permanently soldered on the mother board close to the antenna and cannot be replaced by the user.
2. The radio transmitter module has an on board SAW oscillator at a nominal frequency of 434MHz. Therefore, the carrier frequency cannot be modified.
3. The unique antenna is coupled with a screw directly to a pad on mother board very close to the RF Module. The antenna is also permanently inserted into a plastic panel of the enclosure and cannot be removed without breaking the antenna or the panel. Once the circuit is in the enclosure, there is no access to the antenna and it cannot be replaced by the user of the system.
4. The MCU is soldered on the mother board and cannot be replaced.
5. The data rate and contents of the transmitted command packet is determined by the firmware (software) in the MCU as described in Exhibit 9: *Operational Description*. The non-volatile (FLASH) memory containing the firmware in the MCU is read/write protected by the manufacturer so it cannot be accessed for any unauthorized modifications.