



February 28th, 2011

Nemko Canada Inc.
303 River Road
Ottawa, Ontario, Canada
K1V 1H2

Attn: Director of Certification

FCC ID: Y6Z5139M4

Request Limited Modular Authority

We hereby request Limited Modular Approval based on the numbered requirements identified below as we address them to be included in our application for equipment authorization.

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.

Our equipment meets this by using modular transmitter that has its own RF shielding. This ensures that there is no need for shielding provided by our equipment in order to comply with Part 15 limits. The interface circuitry to the module is designed according to recommendation from the technical documentation provided by the module's manufacturer. This prevents coupling between the RF circuitry of the module and any wires or circuit into our equipment.

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.

Our equipment meets this by using modular transmitter that has its own data buffer. This ensures that there are no excessive data rates or over-modulation.

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.

Our equipment meets this by using modular transmitter that has its own power supply regulator. This ensures that the module will comply with Part 15 requirements regardless of our equipment's power supply circuitry design.



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.

Our equipment meets this by using screw locking agent Loctite threadlocker 220 medium strength blue applied to the SMA connector that connects the antenna to the module’s antenna connector. Thus it is not removable or accessible to the user.

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)).

Our equipment did not meet this explicitly. To exercise the module, it was necessary to be installed in a typical product and so met Part 15 emission limits. There are no ferrites used for the power lines and data input/outputs lines connected to the module.

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.

Our equipment meets this by including labels on Transmitter Module FCC ID: Y6Z5139M4. Our equipment also meets this by using an exterior label with wording: Contains Transmitter Module FCC ID: Y6Z5139M4.

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.

Our equipment meets this by using modular transmitter that are tested in a stand-alone configuration by the manufacturer and complies with Part 15.231 operational and timing requirements.

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)(4). 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.

Our equipment meets this by using modular transmitters that comply with the RF exposure requirements. The IEEE 802.15.4 wireless module complies with Part 15C (FCC IDENTIFIER: Y6Z5139M4).

As the numbered requirements number 5, listed above, could not be demonstrated, therefore Procuro, Inc. requests a "Limited Modular Approval" (LMA). Procuro recognizes this module would only be approved for use when installed in devices produced by a Procuro. Procuro has provided an installation manual to demonstrate Procuro's control of the use of this module.

Sincerely,

Juan Carlos Lau
V.P., Global Operations
Procuro, Inc.