



Dear Industry Canada / FCB and FCC / TCB representative,

We request **“Limited Modular Approval” (LMA)** for our proprietary 433 MHz wireless switching module, which will be installed exclusively by us, the Grantee, in products which we will design and manufacture.

This device is a complete RF transmitter, i.e., it has its own reference oscillator (e.g., VCO), antenna, etc. The only connectors to the module, are power supply and activation (Auto/Off/On) switch.

Compliance with Industry Canada Safety Code 6 RF Exposure requirements and FCC RF Exposure requirements is passing and is calculated in accordance with the test report, with sufficient margin.

We are aware that the end device into which an authorized module is installed is not required to obtain a new authorization for the module, however this does not preclude the possibility that some other form of authorization or testing may be required for the device (e.g., A unit in which an authorized module is installed must still meet conducted and radiated emission limits).

The modular transmitter *does not* have its own RF shielding. However, the module does not 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 emissions limits. Coupling between the RF circuitry of the module and any wires or circuits in the device into which the module is installed that may result in non-compliant operation, will be verified on an end-product basis.

The modular transmitter does not have buffered modulation/data inputs, since such input ports are not provided on the device. The input signal only serves to activate an on/off RF pulse, and will not encounter conditions of excessive data rates or over-modulation.

The modular transmitter has its own power supply regulation. This ensures 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.

The modular transmitter complies with the antenna requirements of Section 15.203 and 15.204(c). The antenna is permanently mounted on the module. The antenna to be used with the module is included with the test report. Any additional antennas will result in a Class II permissive change.

The module was tested inside the plastic enclosure of the final product, which does not provide any shielding properties, therefore the module can be considered to be tested in the stand-alone configuration. This shows that the module is capable of complying with Part 15 emission limits regardless of the device into which it is eventually installed.

The transmitter module complies with the AC line conducted requirements found in 15.207.

The power lines and data lines connected to the module do not contain ferrites which will not be marketed with the product. The lengths of these lines are typical of actual use in the product.

No accessories, peripherals, or support equipment connected was required, as the modular transmitter can operate in a stand-alone condition.



The modular transmitter will be labeled with its own IC/FCC ID number, and, if the IC/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 will also display a label referring to the enclosed module. This exterior label of such products will use wording such as the following: "Contains FCC ID: YCH-IVACRFM." Included in our application is an example of this label.

Internal documentation regarding the use of this module explains these requirements. As this module will be for use exclusively by the Grantee, we attest that we will retain control of this labeling and ensure this requirement is met on the end use product.

The device is not a split modular transmitter.

The modular transmitter complies with any applicable RF exposure requirements, as per the test report. The end device manual will provide specific installation and operating instructions for users, installers and other interested parties to ensure compliance, such as that 'a minimum distance of 20cm between the antenna and any person is to be maintained during operation' under typical operating conditions.

As the shielding requirement is not met, we request a *limited* modular approval.

The modular device will be installed in the end product exclusively by the Grantee. We, the Grantee, attest that we will retain control over the installation of the device in the final product, such that compliance of the end product is assured. We attest that manufacturing procedures, policies, and training will be implemented for those involved in the production process to ensure compliance during installation in the end product. We recognize that an operating condition on the grant of equipment authorization for the module will state that the module is only approved for use when installed in devices produced by us, "MBright", the Grantee.

Control of the end product(s), into which the module will be installed, will be maintained by verification of the end product(s), such that full compliance of the end product is always ensured.

I, the undersigned, attest that I am an authorized representative of MBright and attest to the above.

Leon Brown,
CFO

June 2, 2010