

DATE: 3/14/2017

SUBJECT: Firefly Limited Module: FCC ID: O76-T6SG0910A and IC: 10391B-T6SG0910A

Dear Timco,

This letter is in support of request for the limited modular approval to the subject equipment described above. This Limited Module is for use in Gojo Industries, Inc. touch-free Dispenser types: ES8, CS8, CB8 – also referred to as Firefly Host Dispenser in this and other documents. This is new request for IC - Canada and FCC Limited Module approval certification.

Below in **BOLD** is Gojo Industries, Inc. response documenting compliance with the modular approval requirements for unlicensed modules:

1. The radio elements must have the radio frequency circuitry shielded. Physical components and tuning capacitor(s) may be located external to the shield, but must be on the module assembly;

The module does not comply with this requirement as it is a Limited Module that can only be used in the Host Firefly dispenser. The module meets the all emission requirements in the Host dispenser – see Gojo Firefly Test Report and therefore the module does not need a shield.

2. The module must have buffered modulation/data inputs to ensure that the device will comply with Part 15 requirements with any type of input signal;

The module does not comply with this requirement as it is a Limited Module that can only be used in the Host Firefly dispenser. Because it can only be used in the Host, no buffering of data inputs is required for proper operation or compliance to the emission requirements.

3. The module must contain power supply regulation on the module;

Although the module does have its own series 3.3VDC regulator for providing regulated power to the module, the module does not need to comply with this requirement as it is a Limited Module that can only be used in the Host Firefly dispenser. No power supply regulation is required for proper operation or compliance to the emission requirements. The regulation is provided to safe guard the module circuitry incase the Host batteries are not installed properly.

4. The module must contain a permanently attached antenna, or contain a unique antenna connector, and be marketed and operated only with specific antenna(s),

The module does comply with this requirement as the antenna is a PCB trace directly onto the printed circuit board of the module.

5. The module must demonstrate compliance in a stand-alone configuration;

The module does not comply with this requirement as it is a Limited Module that can only be used in the Host Firefly dispenser. Because it can only be used in the Host it therefore cannot be used in a stand-alone or in any other configuration.

6. The module must be labelled with its permanently affixed ID label;

The module does comply with this requirement as ID label is fixed to the modules – see photos of label location.

7. The module must comply with all specific rules applicable to the transmitter including all the conditions provided in the integration instructions by the grantee;

The module complies with this requirement and an installation manual is provided to Gojo licensed distributors containing instructions of how to install the module into the Host dispenser. See Install Manual provided.

8. The module must comply with RF exposure requirements;

The module does not comply with this requirement as it is a Limited Module that can only be used in the Host Firefly dispenser. The host dispenser is a RSS-102 Annex C /FCC 15.249 device that does not have RF Exposure requirements – therefore this test was not performed.

Best Regards, - Grant Carlson, RF Engineer
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