



8/1/2016

Dear Application Examiner:

[PayRange BluKey Modem, FCC ID 2AF78-00377] is seeking Limited Modular Approval (LMA). The radio meets the requirements for LMA as detailed in FCC 15.212. Compliance to each of the requirements is described below:

1. **"The modular transmitter must have its own RF shielding."** The EUT does NOT comply however it is not applicable for Limited Modular Approval. A top shield was prohibitively expensive and not necessary to meet EMC requirements. Some shielding is provided by the PCB layers.
2. **"The modular transmitter must have buffered modulation/data inputs."** The EUT has buffered data inputs to insure compliance with Part 15 requirements under conditions of excessive data rates or over-modulation. The EUT complies since all modulation circuits are within the CS1010 and controlled by the internal processor.
3. **"The modular transmitter must have its own power supply regulation."** The EUT has its own power supply regulation to insure compliance with Part 15 requirements regardless of the quality or level of external DC supplying the module from the host unit. Please see Schematics exhibit.
4. **"The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c)."** The EUT meets the FCC antenna requirements since the PCB antenna is permanently attached and cannot be changed.
5. **"The modular transmitter must be tested in a stand-alone configuration."** The EUT does NOT comply but it is not required for LMA. As specified in 15.212(b), the manufacturer must only "demonstrate by alternative means in the application for equipment authorization that the modular transmitter meets all the applicable Part 15 requirements under the operating conditions in which the transmitter will be used." We have done this by testing the device in every host with which it will be used. The hosts included are the only hosts that may be used with this device.
6. **"The modular transmitter must be labeled with its own FCC ID number."** The EUT complies since it is labeled with its own FCC ID number. Please see FCC ID label & location exhibit. Since the FCC ID number will not be visible when the module is installed inside a host device, another label with the FCC ID will be applied to the exterior of the host device.
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."** The EUT is compliant with all applicable FCC rules. Detail instructions for maintaining compliance are given in the User Manual.
8. **"The modular transmitter must comply with any applicable RF exposure requirements."** The EUT is compliant with all applicable RF exposure requirements. It will not be used within 20cm of the body. Please see RF Exposure Exhibit.

Please contact me if you have additional questions. Your attention to this matter is greatly appreciated.

Best regards,

Paresh Patel  
Founder and CEO