Modular Approval Request Letter

Nov 14, 2018

Dear Application Examiner, Gemal to M2M GmbH, LTE Data-Only SMT World-Module, modular name : SIM8905A, FCC ID: 2AJYU-8PSA301

would like to have your authorization as a modular approval. The requirements of Public Notice DA00-1407 have been met and shown on the following statements.

Requirement of Public Notice DA00-1407 / part 15.212	Answer from applicant
1. The modular transmitter must have its own RF shielding.	Yes, The EUT does provide a RF shielding. Refer to EUT Picture.
2. The modular transmitter must have buffered modulation/data inputs (if such input are provided) to ensure that the module will comply with Part 15 requirement under conditions of excessive data rates or over-modulation.	The EUT has buffered data input it's integrated in chip MDM8909.
3. The modular transmitter must have its own power supply regulation.	The EUT has its own power supply chip, it's PM-8909.
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)	No, trace design on host
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.	The EUT was tested in a stand-alone configuration via a test kit. Please see section photographs of test configuration in the test report.
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.	Please see exhibition label sample for the FCC ID of this module. And also in the exhibition User's manual, there are instructions given to the OEM on how to label the end product.
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.	The EUT is compliant with all applicable FCC rules. Details instructions for maintaining compliance are given in the User Manual.

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 Section15.247(b) (4). Modular transmitters approved under other Sections of Part 15. When also need to address certain RF Exposure concerns typically by providing specific installation and 01 rating instructions for users installers and other interested parties to ensure compliance.

The EUT is complying with exposure requirement evaluation. The MPE report is addressed in the RF exposure exhibition.

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