

18<sup>th</sup> November 2014

To whom it may concern

# RE: SECTION 15.203 ATTESTATION OF MANDATORY INSTALLATION BY PROFESSIONAL INSTALLER

The following letter serves as an attestation of the installation and marketing systems of our T5 program, in submission for our application for FCC approval.

FCC ID Affected: 2AAARTACHO5B

## (a) APPLICATION / INTENDED USE

**Target Markets** 

- Transit Bus Authorities
- Rail Maintenance and Infrastructure (Road-Rail)
- Specialty outfitters of vehicles requiring a high number of vehicle input monitoring and logging capabilities

#### Application

- Records threshold events and specified data on board vehicle and communicates to a secure hosted (Cloud) reporting system.
- Data is recorded from:
  - o Array of sensors on device and external to device eg accelerometer, brake pressures, GPS
  - o Analogue/Digital Inputs
  - o CANBus Network
- Data is then used for event reconstruction, vehicle maintenance monitoring, driver analysis for regulatory, cost improvement and risk mitigation reasons

### (B) INSTALLATION REQUIREMENTS

Marketing and associated installation is limited to vehicle OEM / professional vehicle outfitters (Eg NOVABUS, New Flyer) and our approved aftermarket service distributor (Axletech)

Circuitlink maintains control over the installation and set up of its equipment through a secure software platform. Circuitlink proprietary software is required to:

- Communicate with the device to activate functionality and configure it's recording and reporting behaviour
- Access reporting tools to register the device and then view and interpret any data collected by the device

Device configurations are unique to customers and vehicle types, and without software access and installation cannot be completed and device is inoperable. This software is only available online and cannot be downloaded to a PC. The Installers must seek approval through Circuitlink who then provide training in correct use of the software and review installers capability for physical installation before registering them as an approved installer. Then we maintain their permission levels in the online software module.

From a physical installation perspective, before product ca be supplied a professional assessment is required of:

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- Customers data requirements
- Vehicle systems, integrated equipment
- Connection, integration and sensor requirements

In particular, such a person will need to have a sound working knowledge of

- Vehicle / CANBus electronic systems
- Related equipment such as the Engine Control Unit and their SAE standards and associated data formats eg J1939
- Analogue and Digital Inputs of the vehicle
- Sensors and interfaces required
- Understand and ensure harmony between other CAN Bus linked devices

Following these assessments, Circuitlink then specifies the antenna which is then supplied as part of the complete product.

## (C) MARKET CHANNELS

This solution is exclusively marketed as a specialised vehicle data logger to assist businesses in regulatory compliance, risk mitigation and fleet improvement programs. It is not available to the public and is not marketed online or mail order.

- Majority of business is won through a tender process, on a direct B2B basis. The antenna forms part of the specification which is agreed during the evaluation process, and is then a stipulated item that forms part of the product kit supplied.
- It is sold and distributed through select approved distributors who offer a direct channel to the target speciality markets and an appropriate field technical support capacity
- Circuitlink does not sell nor permit the sale of its devices through retail, online, by mail etc, nor do we market to general public.
- End users must be readily identifiable, and this is then reinforced through software control.

Yours sincerely

**Tony Davis** 

Principal & CEO