

Federal Communication Commission
Equipment Authorization Division, Application Processing Branch
7435 Oakland Mills Road, Columbia, MD 21048

8th of April 2014.

Oticon 'WLP Special' radio module with FCC ID: U28WLPS10

Limited Modular Approval Request

We hereby request to approve the above product as a *Limited* Modular Approval in accordance with FCC Public Notice KDB 996369 D01 Transmitter Module Equipment Authorization Guide v01r04, released October 2013, and the rules of the Commission regarding modular transmitters (§15.212) operating under FCC's part 15 about RF Devices.

The requirements are met as follows:

- 15.212(a)(1)(i) The radio part of the module has no own RF shielding. Therefore we apply only for a *Limited* Modular Approval (See also §15.212(b)). The module is also constrained to be used by Oticon A/S or its affiliates or sold to Original Equipment Manufacturers (OEM) only. The module contains a weak RF transmitter and therefore fulfils Part 15 emission limits without any additional RF shielding. The module is a fully integrated radio module for short range wireless programming of hearing aids, including microcontroller host and radio circuits on board and intended for Oticons and affiliates wireless hearing aids only. Therefore the module cannot be used directly by end users. The behaviour of the wireless module is locked by the design and can only be changed by Oticon A/S or its affiliates, so the compliance of the end product is always ensured.
- 15.212(a)(1)(ii) The module includes buffer stages for its external data/programming inputs.
- 15.212(a)(1)(iii) The wireless parts of the radio module share the power supply with digital parts, like the microprocessor host. Therefore we apply for a Limited Modular Approval with the same argumentation as in point 15.212(a)(1)(i).
- 15.212(a)(1)(iv) The low power inductive radio part of the WLP Special module has only a dedicated loop antenna connected to it and is mounted together with its battery in a fixed plastic shell, which is normally not interchangeable by the end user.
- 15.212(a)(1)(v) The radio parts are included together with the microcontroller host inside the WLP Special module, which was tested in a stand-alone configuration as can be seen in the CETECOM test report no. **1-7410/13-01-07**. The module requires no external host, only some external plastic parts e.g. holding the battery and the loop antenna in fixed locations.
- 15.212(a)(1)(vi) The size of the module is big enough for the regulatory FCC label in its short form to be placed on the side of the plastic shell holding it, besides also to be found in user manuals and the installation guide.
- 15.212(a)(1)(vii) The module is compliant with all applicable FCC rules. Maintenance of compliance is always ensured as only Oticon A/S or its affiliates are able to alter the antenna or other wireless related behaviours.
- 15.212(a)(1)(viii) The module is compliant with all applicable RF exposure requirements. This is always ensured as only Oticon A/S or its affiliates are able to alter the antenna or other wireless related behaviours.

If you have any questions, please feel free to contact us at the address shown below

Sincerely,



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