Advanced Card Systems Ltd.
Unit 2010-2013, 20th Floor, Chevalier Commercial Centre, 8 Wang Hoi Road, Kowloon Bay, Hong Kong.
Tel: +852 3423-3315 Fax: +852 2796-1286

Limited Modular Approval Letter

03/18/2015

Dear Application Examiner:

Advanced Card Systems Ltd., is submitting this application for certification of their Smart Card Reader under FCCID: V5MACM1281. It is seeking limited modular approval. The radio meets most of the requirements for modular approval 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 radio portion of the module doesn't have its own RF shielding. The reason due to the RF shielding cause the reading performance not well, and proofed that the radiation from the ACM1281 is below the FCC requested with buffer when no RF shielding. This is one reason for limited modular approval
- 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. Please see the Schematics exhibit.

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. Also, the technical report exhibit contains AC power line conducted emissions data taken with the EUT powered from a linear power supply that contains no EMC suppression components.

4. "The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c)."

The EUT will be professionally installed and therefore meets the FCC antenna requirements. Please see Antenna information exhibit, user manual exhibit, and internal photos exhibit.

5. "The modular transmitter must be tested in a stand-alone configuration." The EUT was tested in a stand-alone configuration.

Please see test setup photos exhibit and technical report exhibit.

- 6. "The modular transmitter must be labeled with its own FCC ID number."

 The module will be labeled with its own FCC ID number. Please see FCC ID label & location exhibit
- 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 necessary explanation to be complied with this requirement is contained in the use manual, and please refers to the Use manual.

8. "The modular transmitter must comply with any applicable RF exposure requirements." The EUT is compliant with all applicable RF exposure requirements. Please see RF Exposure Exhibit.

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This Limited modular approval (LMA) is applied with the understanding that we, the applicant will demonstrate that they will retain control over the final installation of the device, such that compliance of the product is assured. The operating conditions on the LMA for the module must state that the module is only approvable for use when installed in devices produced by us.

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

Best regards,

Signature:

Elsie Lai

Senior Product Marketing Manager