

April 19, 2011 Dear Application Examiner:

OEM Controls, Inc is submitting this application for the original certification of their Zigbee radio product, ST-570 RFID Hour Meter, with Models H, V and S, FCC ID: YD7-ST5HVS. This product is sought under FCC 15.247 as a DTS device. The product was tested with all model's non radio parts present; thus it was in a 'worst-case' scenario.

The ST-570 RFID Hour Meter will only be used 20cm or greater from users and can be classified as a mobile device per FCC 2.1091.

The ST-570 RFID Hour Meter is designed to be vehicle mounted and is powered through the vehicle's battery. Thus, no provision for connection to the AC mains either directly, or indirectly from another device is required. Thus, no AC power line data was taken.

The radio utilizes an internal F type antenna which is actually part of the product's PCB ground-plane. Thus, it is permanently mounted and cannot be removed. This configuration satisfies the requirements of 47 CFR 15.203.

The technical reports and exhibits demonstrate compliance with FCC rules 47 CFR 15.247 as a DTS transmitter.

Your efforts in reviewing this application are greatly appreciated.

Best regards,

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Director of Engineering

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