

Intelibs, Inc 1500 Stony Brook Road Stony Brook, NY 11794

December 30, 2016

Bay Area Compliance Labs Corp. 1274 Anvilwood Ave. Sunnyvale, CA 94089

Re: Justification Letter for Test Exemption on Part 24E in Radio Hub Unit under FCC ID: Z69D01T4JX5

Dear Whom It may Concern,

The Radio Hub Unit (RHU) device tested under FCC ID: Z69D01T4JX5 is designed in the modular architecture same as the precedent device under FCC ID: Z69D01T4JX4 that was certified on FCC Part 22 and 24. As modular architecture, the RHU consists of four individual radio modules that are independently configured and operated. These four radio modules of 700, 850, 1900, 1700 MHz frequency bands are to be tested and certified under FCC ID: Z69D01T4JX5.

However, since the PCS frequency band radio module had been tested and certified and referred to an approved device under FCC ID: Z69D01T4JX4, the FCC Part 24E of the Radio Hub Unit with proposed FCC ID: Z69D01T4JX5 should be exempted to conduct the test. The PCS band module has not been changed in hardware and software functionality as well.

Sincerely,

Seyong Park President

Intelibs, Inc