



Date: December 20, 2021

Office of Engineering and Technology Laboratory Division Equipment Authorization Branch Federal Communications Commission Laboratory 7435 Oakland Mills Road Columbia, MD 21046

Subject: Class II Permissive Change for PCB and Part Modification and PAG C2PCPCX

Dear Sir/Madam.

With reference to the C2PCPX procedure subject to PAG approval (item C2PCPX in KDB Publication 388624 D02) and KDB inquiry #144531, the application shall meet the following conditions:

- 1) The requirements of § 2.1043 are fulfilled, i.e., device's block functions for the fundamental frequency, primary modulator circuit, maximum power or field strength ratings shall remain unchanged.
 - No change in overall block diagram, max power & primary modulator circuit
- 2) Transmitter PCB layout and parts changes are only permitted if there is no change in the identification of a device's form, functional specification, as initially granted, or previously approved under a Class II permissive change.
 No change in terms of layout and functional specification.
- PCB changes are limited to non-substantive modifications layout changes to the same size physical circuit board previously granted.
 Yes. PCB stack up, form factor and material are maintained.
- 4) C2PCPX is not permitted to add, remove, augment, or change capabilities, such as transmitters, increased bandwidth, additional rule parts, bands, etc.

 There are no addition or removal in the transmitter capabilities, bandwidth or rules part.
- 5) In the PAG submission for item C2PCPX, the applicant shall provide complete information on testing demonstrating that the proposed changes for fundamental emissions are unchanged within the normal acceptable tolerances and out band emissions do not exceed the appropriate limits. The PAG submission shall include all applicable test reports and internal photos.
 - The test reports and internal photos are provided in the application.
- 6) The modified device shall not be marketed under the existing grant of certification before confirmation that the C2PCPX PAG is approved and granted. Yes.
- 7) Software Defined Radio (SDR) grants that use the C2PCPX procedure are not permitted to make subsequent Class III permissive changes. Software Defined Radio (SDR) is not used for this application.

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- 8) The C2PCPX PAG procedure has no impact on the provisions of V) of this publication for nonSDR software-only changes, thus adding an equipment class when related to rule changes is still permitted.
 - There are no additions of equipment class.
- 9) Class I permissive changes are not permitted under this C2PCPX procedure. Yes, Class I permissive changes were not performed

Sincerely,

Arine Lee

FCC/IC Certification Manager

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Product Changes illustration and comparison

Description of the changes:

- 1. The changes were triggered due to BT/WIFI chipset part shortage and a new BT/WIFI chipset is replaced.
- 2. Few components were replaced at Power Management section (PMIC), Controller, Peripheral, Interface Board and Generic Option Board (GOB) due to component supply constraint. All replacement parts performance are comparable to the existing parts.
- Added UL protection diode in harmonic filter & receiver section in layout due to space constraint on other layout location. No change to harmonic filter & receiver overall schematics circuitry.
- 4. There are no mechanical changes.
- 5. No change to the existing sales model number, however there are 4 new variants models added into the family which is electrically/mechanically identical except not having Generic Option Board (GOB) on the new model addition.
- 6. Reuse shipping batteries, chargers and accessories.



- * Changes are marked in yellow box. White circle indicates the newly added UL Protection Diode in Harmonic filter & receiver Layout due to space constraints on other areas.
- * The UL Protection Diode is placed in the TIA4950 model only and is not applicable for non-TIA4950 model.





