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Federal Communications Commission
Authorization and Evaluation Division

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Subject: Compliance to Permissive Change Policy for Functional Variants Regarding Application for FCC ID: 2ALEPT0008710

The STORK, Battery Power and STORK, External Power are both LoRa sensors for IoT applications. Each sensor variant can support multiple RF regions, including North America. Both variants share the same printed circuit board. The 'Battery Power' and 'External Power' variants are functional variants with their only difference being that the 'External Power' variant has mechanical enclosure support for a cable for an optional external DC power supply, while the 'Battery Power' variant does not. Both variants can be powered by a single C-cell 3.6 V LTC battery, but the 'External Power' variant uses the battery as the power source only if the external supply is not connected. Otherwise, both variants are not different in RF circuitry.

The functional variants are compliant to the requirements outlined in Section III of KDB Publication 178919 D01 (Permissive Change Policy) to be authorized under one FCC ID. Specifics for the compliance to each subpart are described below.

Section III Part A: Each variant is considered electrically equivalent as per the permitted changes described in § 2.1043(a).

Section III Part B: The same transmitters are populated on each variant.

Section III Part C: There are no changes in the integral active hardware components between functional variants that would otherwise result in different radio parameters or cause the device to be non-electrically identical.

Section III Part D: There are no substitutions of non-electrically identical parts required between variants.

Section III Part E: There are no changes in transmitter amplifiers between variants.

Section III Part F: There are changes to minor circuitry for non-transmitter portions, the specifics of which are depopulated components related to the excluded sensing functions and their interfacing circuitry. The variant acting as the "worst case" from an emissions perspective was tested, namely, the STORK, External Power (T0008396) model.

Sincerely,

David Tholl
Chief Technology Officer
TEKTELIC Communications Inc.