



2nd Floor, 63-66 Hatton Garden, London - EC1N 8LE
Tel: +44 (0) 203 745 5201

**DECLARATION OF COMPLIANCE WITH ITEMS 1-9 OF THE
NOTIFICATION: CLASS II PERMISSIVE CHANGE FOR PCB AND PART MODIFICATION AND PAG
C2PCPX**

17 April 2023

Element Materials Technology
100 Frobisher Business Park
Leigh Sinton Road
Malvern,
Worcestershire
WR14 1BX
UK

RE: Declaration of compliance with Items 1-9
FCC ID: 2AEHI-EP0121

To Whom It May Concern:

The Items of concern have been listed below with details listed as to how each item is affected by the change in question

1) The requirements of § 2.1043 are fulfilled, i.e., the device's block functions for the fundamental frequency, primary modulator circuit, maximum power, or field strength ratings shall remain unchanged.

The devices functionality is completely unaffected by the change in question. The frequency, modulator circuits, maximum power output and field strengths remain un-changed.

2) Transmitter PCB layout and parts changes are only permitted if there is no change in identifying a device's form, functional specification, as initially granted or previously approved under a Class II permissive change.

The devices PCB shape and overall form factor and function remain unchanged.

3) PCB changes are limited to non-substantive modifications layout changes to the same size physical circuit board previously granted.

The changes are limited to changing the footprint of the MCU IC as detailed in the original Change Notification document RPT-002829

4) C2PCPX is not permitted to add, remove, augment, or change capabilities, such as transmitters, increased bandwidth, additional rule parts, bands, etc.

No change to radio characteristics has been made by the changes detailed. The BLE transmission characteristics remain unaffected.

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-of-band; emissions do not exceed the appropriate limits.
The PAG submission shall include all applicable test reports and internal photos.

Summary of the test data illustrating emissions testing remains within specification has been included and referenced in the accompanying Report RPT-002829 and additional data included in:

Current Design Radio Test results - TRA-056398-47-01A
New Design Radio Test Results - TRA056398-47-03A
EMC Results - TRA-056398-35-02A

6) The modified device shall not be marketed under the existing grant of certification before confirmation that the C2PCPX PAG is approved and granted.

The modified device will not be marketed prior to approval

7) Software Defined Radio (SDR) grants that use the C2PCPX procedure are not permitted to make subsequent Class III permissive changes.

N/A The device does not contain SDR

8) The C2PCPX PAG procedure has no impact on the provisions of V) of this publication for non-SDR software-only changes; thus, adding an equipment class when related to rule changes is still permitted.

N/A

9) Class I permissive changes are not permitted³ under this C2PCPX procedure.

N/A

Signed:

Alastair Traquair

Alastair Traquair

Director of Quality and Regulatory Compliance