

**Asunto:** RE: Response to Inquiry to FCC (Tracking Number 729799)

**De:** [oetech@fcc.gov](mailto:oetech@fcc.gov) <[oetech@fcc.gov](mailto:oetech@fcc.gov)>

**Enviado el:** martes, 16 de julio de 2024 21:01

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**Asunto:** Response to Inquiry to FCC (Tracking Number 729799)

**Inquiry on 03/29/2024 :**

**Inquiry:**

Dear FCC,

Following the KDB 484596 D01- TEST REDUCTIONS VIA DATA REFERENCING, we are submitting an Inquiry on behalf of our customer SEPURA LTD with Grant code XX6.

We are looking to certify the model SC2028 with FCC ID: XX6SC2028M. This product has 3 different RF interfaces: TETRA (809-824 MHz and 854-869 MHz), Bluetooth and Wi-Fi 2.4 GHz.

SC2028 has been certified before under following FCC ID: XX6SC2028. However, due to the availability issues for the current Bluetooth and Wi-Fi module (LBEP5CLWTC-631 Type WT), and GNSS module (Ublox M8), SC2028 has undergone a design change with new BT/Wi-Fi module - LBEE59B1LV-278 Type 1LV and a new GNSS module (Ublox M10).

New BT/Wi-Fi module is already certified under following FCC ID: XX6LBEE59B1LV.

GNSS is not part of the certification and customer will perform a SDoC.

Attached to this Inquiry you could find attached:

1- Internal photos for previous model (FCC ID: XX6SC2028) and the one we would like to certify (FCC ID: XX6SC2028M). There are no differences, only in BT/Wi-Fi module and GNSS module (not part of the certification). External pictures are the same

ones. Because of that,  
we have not attached them.

2- Cover letter strategy as justification of the approach.

3- Spotcheck test plan followed.

Thanks in advance for your support.

Best regards,

Miguel

**FCC response on 04/04/2024**

Please see comments below

1. Photos must be side-by-side of variant and reference devices with annotations that provide the required explanations in terms that should be clear to a reviewer who is not familiar with the specific design of the devices.
2. Spot Check Test Plan(s) based on the worst-case should list all RF exposure and/or EMC compliance rule subparts (do not skip any) indicating which will be fully tested and which will be spot checked along with acceptance criteria. A tabular format would be greatly appreciated.

Thank you

---Reply from Customer on 04/22/2024---

Dear FCC,

Answering to your comments:

- Please find attached the photograph comparison document between the reference device (FCC ID: XX6SC2028) and the variant device (FCC ID: XX6SC2028M).
- Please find attached the Spot check plan.

Thanks in advance for your support.

**FCC response on 04/26/2024**

Additional information is needed:

- Photos need to be annotated with HW differences. Please use side-by-side illustrations only.
- Spot check plan does not state that referenced tests will be spot-check tested. Every referenced test must be spot-check tested.

ECR requirements must be explicitly addressed.

Thank you.

---Reply from Customer on 06/17/2024---

Dear FCC,

According to your comments I have created two additional documents.

The first one is a comparison document with photographs side by side between Reference device and Variant device.

The second one is a technical document where I have explicitly addressed the ECR requirements, the crossbar table and all information needed to support the inquiry. Even, I have indicated the spot check plan followed.

I hope that this provided information helps you to clarify the open points.

Thank you.

#### **FCC response on 06/28/2024**

Test plans continue to show referenced tests that are not indicated for spot-check testing. Every referenced test must be spot-check tested without any exceptions.

Thank you.

---Reply from Customer on 07/02/2024---

Dear FCC,

We have modified accordingly the document "KDB DATA REFERENCE model SC2028" generating a new version.

This new version includes the full testing performed on the REFERENCE device or integrated module and all the full testing or spot checking performed on the VARIANT device to ensure the compliance with the KDB 484596 Data Referencing.

Now, everything is clearer.

Thank you in advance.

#### **FCC response on 07/16/2024**

ECR is conditionally approved: Every referenced compliance test must be spot-check tested without any exceptions.

Thank you

#### **Attachment Details:**

[Comparison Photographs](#)

[Cross Reference table Spot check plan](#)

[CON-REP-00393\\_SC2028\\_BT-WiFi\\_Internal\\_Photos\\_Comparison](#)

[KDB DATA REFERENCE model SC2028](#)

[KDB DATA REFERENCE model SC2028\\_v2](#)

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