

**De:** oetech@fcc.gov  
**Enviado el:** jueves, 16 de mayo de 2024 0:25  
**Para:** Miguel Angel Cobo Beladiez  
**Asunto:** Response to Inquiry to FCC (Tracking Number 262012)

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

**Inquiry:**

Dear FCC,

Folliwing 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 SC2124 with FCC ID: XX6SC2124M. This product has 3 different RF interfaces: TETRA (450-470 MHz), Bluetooth and Wi-Fi 2.4 GHz.

SC2124 has been certified before under following FCC ID: XX6SC2124. However, due to the availability issues for the current Bluetooth and Wi-Fi module (LBEP5CLWTC-631 Type WT), and GNSS module (Ublox M8), SC2124 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: XX6SC2124) and the one we would like to certify (FCC ID: XX6SC2124M). 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 04/12/2024**

Dear Inquirer,

overall, your definition of variant and the proposed test approach is acceptable.

However, a clarification is needed about the spot-check plan. As discussed in our guidance, the spot checks need to be performed for the worst-case scenarios (i.e., most challenging from a compliance perspective) identified for the reference device. Unless we missed it, That information did not seem to be present in your description.

The spot check plan then shall clearly outline what test (related to what rule part and device conditions) are being performed. We provide an example table in the KDB publication guidance.

Best regards,

OET Staff

---Reply from Customer on 04/26/2024---

Dear FCC,

Based on your comments, we have created the attached document following the KDB table example.

Thank you.

**FCC response on 05/15/2024**

Dear Inquirer,

in the latest attachment, we do not see the information regarding the identification of the worst-case scenario in the reference model operations; that was we requested in our reply.

In the interest of time, based on the information provided, we accept the data referencing proposal in this inquiry. However, we are adding the requirement that the information regarding the identification of the worst-case scenario in the reference model operation needs to be provided in the test reports that will be then filed by the TCB.

The TCB needs to be able to verify what the spot checks are compared with, thus that needs to be clearly stated. You shall provide a copy of this inquiry to the TCB to support the application, so the TCB can have the full picture, and in support of further grant processing.

Please ensure that the exhibits filed for certification clearly identify the referenced data separately from the spot check test data. The exhibits should specify for what applicable worst-case scenario the referenced data have been considered for.

In some instances, even if there could be measurements considered for Data Referencing for which the Spot Check plan may not require an actual test, the applicability of the referenced data need to be clearly demonstrated through engineering considerations.

This information should be provided up front in the exhibits, so to provide a step-by-step guide for the TCB review and check of the data that have been presented. The TCBs cannot process the applications if the information is missing or not readily available.

The acceptance of a Data Referencing proposal does not waive the manufacturer's responsibility to ensure that the data as filed provides the required demonstration of compliance.

Best regards,

OET Staff

**Attachment Details:**

[Cross Reference table Spot check plan](#)

Do not reply to this message. Please select the [Reply to an Inquiry Response](#) link from the OET Inquiry System to add any additional information pertaining to this inquiry.