

Date: September 7, 2020

Federal Communications Commission
Office of Engineering and Technology Laboratory Division
7435 Oakland Mills Rd
Columbia MD 21046-1609

To whom it may concern:

The PCB layout, SW implementation of FCC ID: B32C6803GBTW (original model) and FCC ID: B32C6803GBTWN (variant model) are identical. The main difference between original and variant model is the WLAN antenna and antenna supplier source. Based on their similarity, the FCC Part 15C (equipment class: DXX) and FCC Part 22, 24 (equipment class: PCB) reuse the original model's result and do spot-check, following the FCC KDB 484596 D01 v01.

The applicant takes full responsibility that the test data as referenced in this report represent compliance for this FCC ID (FCC ID: B32C6803GBTWN).

| Rule Part | Equipment Class | Wireless Technology | Frequency Band (MHz) | Reference FCC ID (Parent) | Type Grant/ Permissive Change | Reference Title | FCC ID Filling (Variant) |
|-------------|--------------------|------------------------|----------------------------|---------------------------------|-------------------------------------|-------------------------|--------------------------------|
| 15C | DXX | NFC | 13.56 | B32C6803GBTW | Original Grant | FR692114D | B32C6803GBTWN |
| Part 22, 24 | РСВ | GSM | GSM 850/1900 | B32C6803GBTW | Original Grant | FG692114-05 FG692114 | B32C6803GBTWN |
| | | WCDMA | Band II, V | B32C6803GBTW | Original Grant | FG692114-05 FG692114 | B32C6803GBTWN |

Sincerely,

Steve Hsu

Sr. Director, Hardware Engineering

Verifone Inc.

Tel: 886-23789-7313 Fax: 886-2-26553168

Email: Steve H@VERIFONE.com