

Date: March 10, 2022

Office of Engineering and Technology
Laboratory Division
Equipment Authorization Branch
Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Subject: Class II Permissive Change for PCB and Part Modification and PAG C2PCPX

Dear Sir/Madam,

With reference to the C2PCPX procedure subject to PAG approval (item C2PCPX in KDB Publication 388624 D02), and KDB inquiry #647977, the application shall meet the following conditions:

- 1) The requirements of § 2.1043 are fulfilled, i.e., device's block functions for the fundamental frequency, primary modulator circuit, maximum power or field strength ratings shall remain unchanged.
The device's block functions for the fundamental frequency, primary modulator circuit, maximum power or field strength ratings shall remain unchanged.
- 2) Transmitter PCB layout and parts changes are only permitted if there is no change in the identification of a device's form, functional specification, as initially granted, or previously approved under a Class II permissive change.
There is no change in the identification of a device's form, functional specification, only PCB layout changes at Bluetooth sections accommodate the new Bluetooth IC changes.
- 3) PCB changes are limited to non-substantive modifications layout changes to the same size physical circuit board previously granted.
PCB is same size physical circuit board previously granted.
- 4) C2PCPX is not permitted to add, remove, augment, or change capabilities, such as transmitters, increased bandwidth, additional rule parts, bands, etc.
There are no addition or removal in the transmitter capabilities, bandwidth or rules part.
- 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 band emissions do not exceed the appropriate limits. The PAG submission shall include all applicable test reports and internal photos.
The test reports and internal photos are provided in the application.
- 6) The modified device shall not be marketed under the existing grant of certification before confirmation that the C2PCPX PAG is approved and granted.
Yes.
- 7) Software Defined Radio (SDR) grants that use the C2PCPX procedure are not permitted to make subsequent Class III permissive changes.
Software Defined Radio (SDR) is not used for this application.
- 8) The C2PCPX PAG procedure has no impact on the provisions of V) of this publication for nonSDR software-only changes, thus adding an equipment class when related to rule changes is still permitted.
There is no addition of equipment class.

- 9) Class I permissive changes are not permitted¹ under this C2PCPX procedure.
Yes, Class I permissive changes were not performed.

Sincerely,



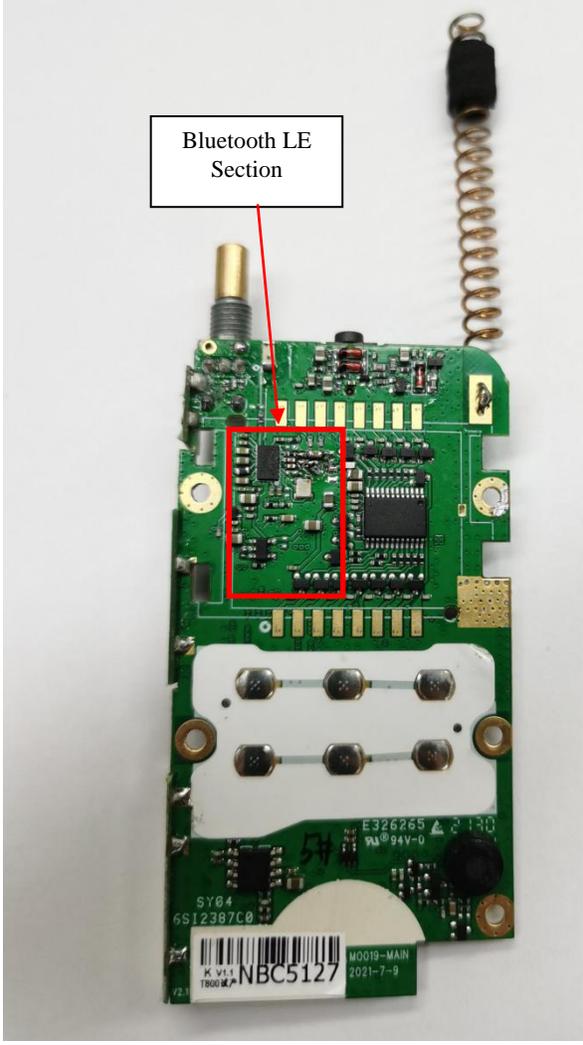
Arine Lee
FCC/IC Certification Manager
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Product changes illustration and comparison

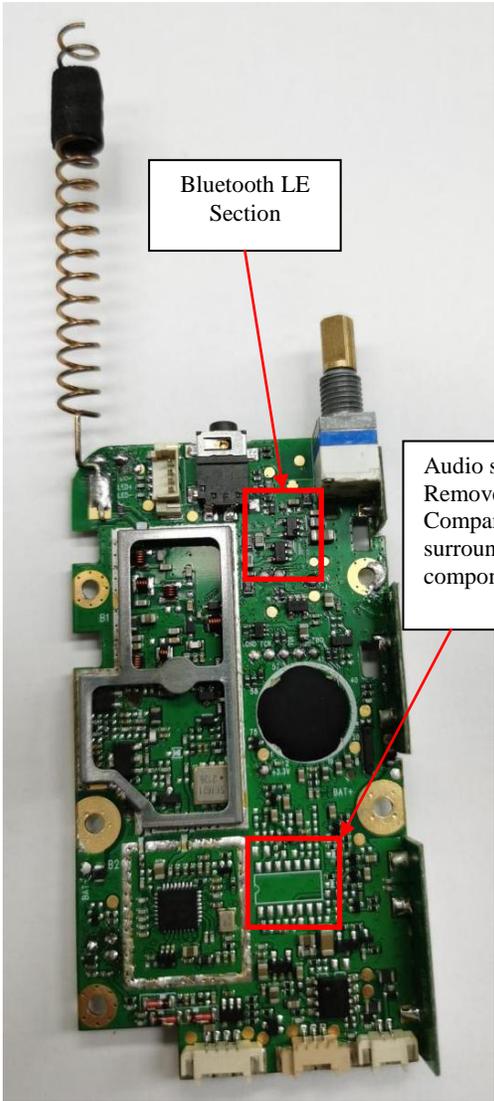
Description of the changes:

1. The changes were triggered due to BTLE chipset part shortage and a new BTLE chipset is replaced.
2. Few passive components were replaced at BTLE Circuitry due to new BTLE chipset part design requirement. All replacement parts performance are comparable to the existing parts.
3. A Comander IC and the surrounding passive components under Audio section are removed. The function of the Comander IC is to compress unwanted audio noise which does not impact the RF performance.
4. There is no mechanical change.
5. No change to the sales model number.
6. Reuse shipping batteries, chargers and accessories.
7. No changes to the RF section.

* Changes are marked in red box.

RF Board	
Before Changes	After Changes
 <p>RF board without shield (Top)</p>	 <p>RF board without shield (Top)</p>

Bluetooth LE Section

RF Board	
Before Changes	After Changes
 <p data-bbox="272 1434 665 1470">RF board without shield (Bottom)</p>	 <p data-bbox="1016 491 1208 583">Bluetooth LE Section</p> <p data-bbox="1273 772 1536 961">Audio section: Removed the Comander IC and the surrounding passive components</p> <p data-bbox="919 1434 1312 1470">RF board without shield (Bottom)</p>