



Sony Corporation
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Remarks

Date: August 24, 2022

PY7-53752E Data Reuse Justification and Summary

To Whom It May Concern:

We are applying data reuse for FCC ID: PY7-53752E (variant) of the following unlicensed band based on the parent model FCC ID: PY7-58692W (Parent). Both devices share the same PCB layout, antennas and components. The unlicensed band data for the parent model remains representative for the variant model (equipment classes DSS, DTS, NII, DCD, and WPT RF Exposure) and test reports for the parent model plus test reports with the spot check data for the variant model have been submitted. The power to be listed on the F-731 and FCC grants for these bands are the values detailed in the parent reports as the spot check data shows all values within expected tolerances of the parent model.

- WLAN 2.4GHz/5GHz (DTS/NII)
- Bluetooth (DSS/DTS)
- WPT (DCD and RF Exposure)

| FCC ID | Bluetooth DSS | Bluetooth DTS | 802.11 DTS | 802.11 NII | DFS | WPT DCD | WPT RF Exposure |
|--------------------|---|---------------------|--|--|---------------------|---------------------|---------------------|
| PY7-58692W Parent | 1M2207200079-05.PY7 | 1M2207200079-06.PY7 | 1M2207200079-08.PY7 1M2207200079-09.PY7 | 1M2207200079-10.PY7 1M2207200079-11.PY7 | 1M2207200079-12.PY7 | 1M2207200079-15.PY7 | 1M2207200079-18.PY7 |
| PY7-53752E Variant | R14311587-E2 | | | | | | R14311587-S3 |
| | Indicates full set of test data. Values in this report to be listed on the grant for these bands. | | | | | | |
| | Partial test data used to confirm that the parent model data is representative for the variant model. Data for these bands is for reference only. | | | | | | |

We are also applying data reuse for FCC ID: PY7-53752E (variant) of the NFC (DXX) and WLAN and Bluetooth SAR data based on the parent model FCC ID: PY7-93060R (parent). Both devices share the same PCB layout, antennas, and components. The NFC (equipment class DXX) data for the parent model remains representative for the variant model and test reports for the parent model plus test reports with the spot check data for the variant model have been submitted. For SAR, WLAN and Bluetooth SAR data are referenced from the parent model FCC ID: PY793060R and are leveraged to cover the variant FCC ID: PY7-53752E. SAR data reuse test plan was approved via manufacturer KDB inquiry. The variant model SAR report has full tested data for the licensed bands.

- WLAN 2.4GHz/5GHz/Bluetooth (SAR)
- NFC (DXX)

| FCC ID | NFC DXX | SAR (WLAN/BT) |
|--------------------|---|---------------|
| PY7-93060R Parent | R14311585-E3 | 14311585-S1 |
| PY7-53752E Variant | R14311587-E3 | 14311587-S1 |
| | Indicates full set of test data. Values in this report to be listed on the grant for these bands. | |
| | Partial test data used to confirm that the parent model data is representative for the variant model. Data for these bands is for reference only. | |



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Regarding the licensed bands (equipment code PCE), the same PCB layout and the components except the licensed bands antennas are identical between PY7-17565F (parent) and PY7-53752E (variant). Therefore, the conducted test data of licensed bands from PY7-17565F can be re-used to PY7-53752E, and PY7-53752E report has full radiated test data for the licensed bands.

| FCC ID | WWAN PCE (conducted) |
|-----------------------|---|
| PY7-17565F Parent | R14311589-E1 |
| PY7-53752E Variant | R14311587-E1 |
| | Indicates full set of test data. Values in this report to be listed on the grant for these bands. |
| | Partial test data used to confirm that the parent model data is representative for the variant model. Data for these bands is for reference only. |

For the detailed explanation, please refer to Theory of Operation Appendix D.

Yours sincerely,

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