



August 11, 2022

Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

Attestation Statement

FCC ID: 2AHIS-VMakerPROUWB

In the matter of Vayyar's submitted documentation for compliance of the electronic module assigned FCC ID **2AHIS-VMakerPROUWB**, Vayyar hereby states that

- 1) The modified product meets the requirements of C2PC under the C2PCPX procedure
- 2) The modified product continues to meet the modular approval requirements.
- 3) That the modified product is intended solely for use in Vayyar product and shall not be marketed as a module to other parties

The "KDB 178919 Notification 202109-011" document outlines 9 requirements, which are addressed hereby:

1) The requirements of § 2.1043 are fulfilled, i.e., the device's block functions for the fundamental frequency, primary modulator circuit, maximum power, or field strength ratings shall remain unchanged.

A: COMPLY.

2) Transmitter PCB layout and parts changes are only permitted if there is no change in identifying a device's form, functional specification, as initially granted or previously approved under a Class II permissive change.

A: COMPLY. The form remains same.

3) PCB changes are limited to non-substantive modifications layout changes to the same size physical circuit board previously granted.

A: COMPLY

4) C2PCPX is not permitted to add, remove, augment, or change capabilities, such as transmitters, increased bandwidth, additional rule parts, bands, etc.

ANSWER: The Module **2AHIS-VMakerPROUWB** is tested for UWB, the control is done through Host Device **2AHIS-VMakerPROUWB**'s WiFi. The **Host Product is obliged to pass certification according to the WiFi test procedures.** The UWB module (**2AHIS-VMakerPROUWB**) will be sold **only as part of the Host Device (2AHIS-VMakerPROUWB)**. Vayyar will be the only host integrator of the module (i.e. will never be sold to 3rd parties as a standalone module).

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-of-band; emissions do not exceed the appropriate limits. The PAG submission shall include all applicable test reports and internal photos.

A: See attached data.

6) The modified device shall not be marketed under the existing grant of certification before confirmation that the C2PCPX PAG is approved and granted.

A: We respectfully await C2PCPX PAG approval

7) Software Defined Radio (SDR) grants that use the C2PCPX procedure are not permitted to make subsequent Class III permissive changes.

A: It is not a SDR product

8) The C2PCPX PAG procedure has no impact on the provisions of V) of this publication for non-SDR software-only changes; thus, adding an equipment class when related to rule changes is still permitted.

A: It is not a SDR product

9) Class I permissive changes are not permitted under this C2PCPX procedure.

A: We are applying for C2PC approval



Yours sincerely,

A handwritten signature in blue ink, appearing to read "Naftali", enclosed within a hand-drawn blue oval.

Name: Naftali Chayat

Title: CTO

Company: Vayyar Imaging Ltd