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Brook, New Jersey, 07058, United States

19 February 2024

Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, MD 21046

RE: FCC Class II Permissive Change for FCC ID: A3LEIT5600

This is to request a Class II permissive change for FCC ID: A3LEIT5600, originally granted on 02 August, 2023.

Please refer to PCB layout difference for both versions file for more detailed information.

- There are 3 major ICs (Transmitter, Power Distribution, Secure Element) and those are identical. Same IC from Same manufacturer would be used.
- Other components such as R/L/C circuit would have same specification but can be different manufacturer.
- Schematic design is identical.
- PCB layout is specified in operational description.

According to Notification 202109-001, this product complies with all of the items 1) through 9) below.

- 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.
- 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.
- 3) PCB changes are limited to non-substantive modifications layout changes to the 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.
- 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.
- 6) The modified device shall not be marketed under the existing grant of certification before confirmation that the C2PCPX PAG is approved and granted.
- 7) Software Defined Radio (SDR) grants that use the C2PCPX procedure are not permitted to make subsequent Class III permissive changes.
- 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.
- 9) Class I permissive changes are not permitted³ under this C2PCPX procedure.

*Conclusion: The device is still in compliance with the part 15 rule, then a Class II application is required.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Jenni Chun". The signature is fluid and cursive, with the first name "Jenni" being more prominent than the last name "Chun".

Jenni Chun/ General Manager
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