

C2PC Cover Letter

Federal Communication Commission

Equipment Authorization Division, Application Processing Branch

7435 Oakland Mills Road

Columbia, MD 21048

TO WHOM IT MAY CONCERN

Request for Permissive Change Class II

FCC ID: HD5-EDA511

Pursuant to CFR § 2.1043, Honeywell International Inc hereby requests a Permissive Change Class II for its application with FCC ID: HD5-EDA511 granted on 10/31/2018.

Modifications:

- Change NFC chipset from PN548 (NQ210) to PN7150 and related electrical circuit.

Detailed modification see operation description.

Besides, we attest that there is no any other hardware and software change to this EUT, the model name shall be same as before.

New chipset can't satisfy pin-to-pin requirement, based on KDB 388624 D02 Pre-Approval Guidance List v17r04 **C2PCPX** and Notification 202109-001, we can meet the following requirements

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.

--- Yes.

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.

--- Yes.

3) PCB changes are limited to non-substantive modifications layout changes to the same size

Safety and Productivity Solutions

9680 Old Bailes Road

Fort Mill, SC 29707 USA

www.honeywell.comwww.honeywellaidc.com

physical circuit board previously granted.

--- Keep modification based on same size physical circuit board.

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

---Reply show as below table.

fundamental emissions		
Original	New	Conclusion
51.40 dBuV/m	51.181 dBuV/m	Within acceptable tolerance
Out-Band Emission		
Can satisfy FCC part 15.225 (d) limit		

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.

--- Yes, detail see the related documents.

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, these devices are not on sale yet.

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

--- This device is non-SDR.

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.

--- N/A.

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

--- N/A.

Sincerely,

Honeywell

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9680 Old Bailes Road

Fort Mill, SC 29707 USA

www.honeywell.com

www.honeywellaidc.com



Name: Mandana Salahshour

Position: Regulatory Compliance Manager

Email: Mandana.Mobasher@honeywell.com

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