



6001 America Center Drive  
San Jose  
CA 95002  
USA



July 29, 2019

To whom it may concern,

### Declarations

**FCC ID: M72- VVXD230**  
**IC: 1849C-VVXD230H**

I, the undersigned, hereby declare that

1. The device does not use the provisions of 47CFR 15.323 (c) (6), random waiting mechanism is not used in this system.
2. The provisions of 47CFR 15.323 (c) (10) and 47CFR 15.323 (c) (11) are not used to extend the range of spectrum occupied over space or time for the purpose of denying fair access to spectrum to other devices.
3. Only the handset will act as the initiating device, which will initiate the establishment of the duplex connection.
4. The device complies with the provisions of 47CFR 15.319(f). The device shall automatically discontinue transmission in case of either absence of information to transmit or operational failure. These provisions are not intended to preclude transmission of control and signaling information or use of repetitive codes used by certain digital technologies to complete frame or burst intervals. The following table explains the reaction of device in case of either absence of information to transmit or operational failure after a connection of its companion device is established.

	Circumstances	Reaction of Handset Unit
1	Switch-off companion device	NA
2	On hook by companion device	NA
3	Switch-off device	NA
4	On hook on device side	C
5	Remove power from device	C
6	Remove power from companion device	A

- A – **Connection is terminated and, transmission ceases.**  
B – Connection is terminated but device transmits control or signalling information.  
C – Connection is terminated but companion device transmits control or signalling information.  
NA – Not applicable represents the device does not contain a hook switch or a power off switch.

5. ML of base unit and handset declared by manufacturer are 30dBm.

If you have questions or need further information, please contact the undersigned.

Regards,

Name: Yuk Wan  
Position: Director (Services) Product Compliance  
Polycom Inc.