

Savant Technologies LLC, dba GE Lighting, a Savant company
1975 Noble Road, East Cleveland, OH 44112 USA

Non-SDR (Software Defined Radio) Declaration Letter

Date: July 5, 2022

Federal Communications Commission
Office of Engineering and Technology Laboratory Division
7435 Oakland Mills Rd.
Columbia MD 21046

Attn: Office of Engineering and Technology

Ref: FCC ID:PUU-KEYPADSG2A

Refer to KDB 442812 D01 SDR Apps Guide v02r03:

The following five questions can be used for determining if a radio can elect to be, or must be an SDR:

1. Can the RF parameters of the device be altered through software?

Yes, go to question 2.

No, not a SDR

2. Can third parties not permitted by the Commission through specific filings modify, configure, or load different software, or make configuration settings to operate the device or host hardware radio frequency parameters (frequency range, modulation type, maximum output power or other radio parameters) in any other way than granted (or expected to be granted)?

Yes, must be an SDR.

No, go to question 3.

3. Is the device capable of operating in any other in any other way than granted, or will be, granted?

Yes, go to question 4.

No, go to question 5.

4. Is this a Part 15 client device as defined in Section 15.202 (as opposed to a master device)?

Yes, qualifies as a Part 15 client device, go to question 5.

No, must be an SDR.

Savant Technologies LLC, dba GE Lighting, a Savant company
1975 Noble Road, East Cleveland, OH 44112 USA

5. Does the manufacturer elect SDR?

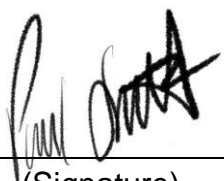
- Yes, elects to be an SDR.
- No, not an SDR.

Final conclusion:

According to the above questions reply, we can confirm this product:

(FCC ID:PUU-KEYPADSG2A) must be a **Non-SDR**.

Sincerely,

By:  _____ Paul Smith
(Signature) (Print name)

Title: Systems Engineer – Safety & Regulatory