

Date: March 10, 2023

## PY7-38431P Data Reuse Justification and Summary

To Whom It May Concern:

We are applying data reuse for FCC ID PY7-38431P (Variant) of DXX, DSS, DTS, and NII equipment codes based on the reference FCC ID PY7-51629L(Parent).

FCC ID PY7-38431P is the variant from FCC ID PY7-51629L. They have the same dimension and share the same PCB layout, antennas and components in WLAN and Bluetooth. Though both devices use different names for the NFC chipset, this difference is the payment management software installed on the secure microcomputer and there is no difference in electrical and RF performance for NFC.

The above unlicensed band data for the parent model remain representative for the variant model (equipment classes DSS, DTS, NII and DXX) and test reports for the parent model plus test reports with the spot check data for the variant model have been submitted. The power to be listed on the F-731 and FCC grants for these bands are the values detailed in the parent report as the spot check data shows all values within expected tolerances of the parent model.

FCC ID	802.11 DTS	Bluetooth DTS	Bluetooth DSS	802.11 NII	NFC DXX
PY7-51629L Parent	SEWM221200 0308RG04	SEWM221200 0308RG03	SEWM221200 0308RG02	SEWM221200 0308RG05	SEWM221200 0308RG07
PY7-38431P Variant	SEWM221200 0310RG04	SEWM221200 0310RG03	SEWM221200 0310RG02	SEWM221200 0310RG05	SEWM221200 0310RG07

	Indicates full set of test data. Values in this report to be listed on the grant for these bands.
	Partial test data used to confirm that parent model data is representative for the variant model. Data for these bands is for reference only

DFS and SAR have been fully tested on the variant model.

We confirm that the test data reuse policy of FCC KDB 484596 D01 Referencing Test Data v01 has been followed and take full responsibility that the test data as referenced from the parent model report represents compliance for the new FCC ID.

Yours sincerely,



Mika Kaneko  
Chief Regulatory Compliance Manager  
Mobile Communications Business Group  
Sony Corporation