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Federal Communications Commission
Authorization & Evaluation Division
7435 Oakland Mills Road,
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December 20, 2021

RE: Class II Permissive Change (C2PC) to an existing certification ISED# **QCIIDS665P1**

To Whom It May Concern:

SMART Technologies ULC is modifying **RFID circuitry (Panel)** to an existing certified product FCC ID# **QCIIDS665P1**. However, the new model is functionally identical to the original product, and the overall system (HVIN: IDS665-3) has remained the same, except changes are only implemented in **the RFID circuit of the panel**. Such changes are made in effort to drive components reduction, in which we have reduced

1) the number of RFID controller boards (Kansas ISM Board), from **three to two boards**, and
2) the number of antenna loops in an antenna sheet, from **93 loops to 62 loops**

No changes have been made to a baseband PCB (Main SoC, Ethernet, HDMI, USB-C), and an existing wireless transmitter on this baseband, which has modular approval (ISED: 24728-SKIWB668BU2) has remained the same. There are no other changes in other sub-systems (such as power supply, RFID circuitry (Pen Tray FCC ID# **QCIIDS665PT1**), video display, and the number of connectors etc.) in this modified design, maintaining physical appearances and functions of the product the same as an existing certified product.

Furthermore, we have done testing at the lab in Calgary to address the modification in RFID circuitry (Panel), and it is found that modified design meets the Class II Permissive Change (C2PC) requirements. Supplementary information relevant to support this application is described in Family Certification Information and Modification Information letter.

Yours faithfully,

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