



**SMART**<sup>®</sup>

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Federal Communications Commission  
Authorization & Evaluation Division  
7435 Oakland Mills Road,  
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RE: Product Modifications - Class II permissive change (C2PC) to an existing certification FCC ID#  
**QCIIDS665P1**

**Modification Information Letter**

SMART Technologies ULC is modifying **RFID circuitry** (Panel) in an existing certified product. The overall system of (Regulatory Model: IDS665-3) has not been modified; particularly, a main baseband PCB which contains Ethernet, HDMI, USB-C and a modular approved wireless transmitter (FCC ID: 2AR82-SKIWB668BU2) has remained unchanged from the existing certification. In addition, RFID circuitry for Pen Tray is not part of the modification. All other digital and analog systems in the product is still the same. Furthermore, due to this modification in RFID circuitry, there is no change in physical characteristics of the product.

Changes are only implemented in the **RFID circuit of the panel (FCC ID: QCIIDS665P1)** to reduce the number of components. The newly modified RFID circuit design is fundamentally the same as in an existing certified product, except where we have reduced the number of *RFID controller boards (Kansas ISM Board)*, **from three to two boards**, and reduced the number of *antenna loops* in an antenna sheet, **from 93 loops to 62 loops**, in this modified design. Therefore, we tested the modified design in an accredited lab to prove that the hardware modifications still meet the requirements established in the applicable RSS standards, thereby meeting the requirements of Class II permissive changes (C2PC) for FCC ID# **QCIIDS665P1**.

Followings are attached to visually explain the modifications.

1. IDS665-3 Block Diagram (Overall System)
2. IDS665-3 Block Diagrams (Panel and Pen Tray)

Yours faithfully,

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