

**ANSWERS TO THE NINE QUESTIONS/ITEMS IN NOTIFICATION 202109-001 (ADDENDUM TO KDB**  
**PUBLICATION 178919 D01 Permissive Change Policy v06.**

1) The requirements of § 2.1043 are fulfilled, i.e., the device's block functions for the fundamental frequency, primary modulator circuit, maximum power, or field strength ratings shall remain unchanged.

**Answer:** The device's block functions for the fundamental frequency, primary modulator circuit, maximum power, or field strength ratings remain unchanged. The details may be found in the exhibit "NUR31W6 changes.pdf" which was uploaded as a long term confidential exhibit classified as being an operational description.

2) Transmitter PCB layout and parts changes are only permitted if there is no change in identifying a device's form, functional specification, as initially granted or previously approved under a Class II permissive change.

**Answer:** there is no change in identifying the device's form, functional specification, as initially granted (there is no previous Class II change granted for this device).

3) PCB changes are limited to non-substantive modifications layout changes to the same size physical circuit board previously granted.

**Answer:** minor layout/schematic changes were made to accommodate the alternate RF amplifier chip. The circuit board itself remained unchanged in terms of size/dimensions. The details may be found in the exhibit "NUR31W6 changes.pdf" which was uploaded as a long term confidential exhibit classified as being an operational description.

4) C2PCPX is not permitted to add, remove, augment, or change capabilities, such as transmitters, increased bandwidth, additional rule parts, bands, etc.

**Answer:** this class II permissive change does not add, remove, augment, or change capabilities, such as transmitters, increased bandwidth, additional rule parts, bands, etc.

5) In the PAG submission for item C2PCPX, the applicant shall provide complete information on testing demonstrating that the proposed changes for fundamental emissions are unchanged within the normal, acceptable tolerances and out-of-band; emissions do not exceed the appropriate limits. The PAG submission shall include all applicable test reports and internal photos.

**Answer:** a test report with selected and relevant tests was submitted for this filing as well as external and internal photographs.

6) The modified device shall not be marketed under the existing grant of certification before confirmation that the C2PCPX PAG is approved and granted.

**Answer:** the modified device will not be marketed, and has not been marketed, under the existing grant of certification and will only be marketed after the issue of the class II permissive change requested through this filing.

7) Software Defined Radio (SDR) grants that use the C2PCPX procedure are not permitted to make subsequent Class III permissive changes.

**Answer: this device is not a Software Defined Radio.**

8) The C2PCPX PAG procedure has no impact on the provisions of V) of this publication for non-SDR software-only changes; thus, adding an equipment class when related to rule changes is still permitted.

**Answer: this application does not requested a permissive change relating to V) "Software changes" of KDB publication 178919 D01 Permissive Change Policy v06.**

9) Class I permissive changes are not permitted under this C2PCPX procedure.

**Answer: the changes to the device as documented in this filing are not, and have not been, treated as a class 1 permissive change.**

Sincerely,



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