

**From:** oetech@fcc.gov  
**Subject:** Response to Inquiry to FCC (Tracking Number 145385)  
**Date:** February 13, 2024 at 4:42 PM  
**To:** nic.johnson@njcompliance.net



**Inquiry on 01/30/2024 :**

**Inquiry:**

We would like to certify a variant device by referencing data from a device that was tested and certified in 2022 under FCC ID:UXUPC6. The original variant featured 2 shielded Nordic nRF52840 modules. The variant model we which to certify de-populates one of the modules, as well as the ethernet port and drive.

**FCC response on 02/13/2024**

Dear Inquirer,

we accept the data referencing proposal **based on the information provided.**

For the spot check plan to meet our guidance requirements, the word "Leverage" in the "Variant 2" column of the Table in the attachment of this KDB needs to be changed as "Full test". In that case, the Table will imply that the data referenced will apply to Receiver and Transmitter radiated emissions, and to the Band Edge Measurements.

In other words, if a compliance measurement is considered for Data Referencing, then it needs to be included in the Spot Check plan.

If your proposal includes data referencing for additional measurements that are currently marked as "Leverage" then those measurements need to be included Spot Check Plan.

In some instances, there could be measurements considered for Data Referencing, but for which the Spot Check plan may not require an actual test, but the applicability of the referenced data need to be clearly demonstrated through engineering considerations.

The exhibits filed for certification shall contain and clearly identify the referenced data, and specify for what applicable worst-case scenario they have been considered. The acceptance of a Data Referencing proposal does not waive the manufacturer's responsibility to ensure that the data as filed provides the required demonstration of compliance. You may provide a copy of this inquiry to the TCB in support of further grant processing.

Best regards,

OET Staff

**Attachment Details:**

[Data referencing test plan and justification](#)

Do not reply to this message. Please select the [Reply to an Inquiry Response](#) link from the OET Inquiry System to add any additional information pertaining to this inquiry.