

The cover letter - C2PCPX

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.

Reply:

The max power of PA remains un-changed with test result in the newly test report being measured lower as compared to the original. Only the following components are changed. RF Switches, and 2G FEM module (IC) with PA, and internal switch are changed

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.

Reply:

PCB remains identical, Both switches, and 2G (GSM) FEM module are pin to pin compatible with same Pin defined.

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

Reply:

Layout is identical with non-electrical identical RF components changed. The datasheet as submitted yields the characteristics with better performance with regards to image suppression, sensitivity, etc. And, Max power is set identically, and lower than the original one.

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

Reply:

There is no augment, add, or change as compared to the original. The 2G GSM FEM module remains in part 22, and 24.
The replacing switches has larger capability to handle higher input power (RF), however, the power by RF remains the same with purpose to yield better power handling, and leakage ratio

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.

Reply:

The submitted evaluation, The spot check summary sheet TA1208, with appendix C of the submitted test report reflects the tolerances as compared to the original are controlled. Furthermore, emissions as tested under spot check mode are even better.

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

Reply:

The modified device would not be marketed, and imported before this PAG is approved, and obtaining the grant

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

Reply:

This application is not SDR equipment, but non-SDR with components changed

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.

Reply:

Inapplicable as this is non-SDR module

9) Class I permissive changes are not permitted³ under this C2PCPX procedure.

Reply:

Class II is pursuant

Signature: 

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Date 01/07/2021

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