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To: Federal Communications Commission 7435 Oakland Mills Road Columbia, MD 21046-1609

Subject: FCC Class II Permissive Change for HVIN: MPH-AC001B, FCC ID: **ZBW-MPHAC001B**

Originally grant date: 8/27/2015

To Whom It May Concern: Ladies and Gentlemen:

This is to request a Class II permissive Change for MPH-AC001B model name (FCC ID : **ZBW-MPHAC001B**) that was originally granted on 8/27/2015.

The major change filed under this application are:

A. CLRC663 RFID Reader Version Update (Version 03):

The radio chip CLRC663 has been updated in a new version (and not a new reference) of the same component. The reference of the components remains CLRC663 (see CLRC663 datasheet Rev. 5.2 2 July 2021 from NXP supplier).

Note that only versions change (02 to 03).

The versions 03 allows more flexibility on some parameters that are not used in our product. This versions 03 is intended to replace the versions 02) in the short term due to obsolescence.

We estimate, according to "KDB Publication 178919 D01 (Section III)" that we are under permissive change because :

The new chip component is pin-for-pin compatible:
 → The chip reference has not changed (it remains CLRC663). Only version change (02 => 03), the pinout is the same for both versions:





- 2. The new chip has the same basic function as the old chip, from an external perspective (internal circuitry may differ):
 → It is the same chip.
- 3. No change in radio parameters has occurred:
 →The software, the antenna matching and antenna did not change
- 4. The same conditions apply when a small area (approximately the same area as the chip) of the PCB is replaced with an equivalent chip:
 - ➡ No modification of the routing around the Radio chip, nor around the RF & Antenna matching.
- B. Smart Card Reader AT90SCR100 replaced by AT90SCR200
- C. SIO Processor SE3100A00 replaced by Secure Element SEL55100000
- D. New resistor (R35) to allow fine tuning the limit value
- E. New rerouting near the RF area

Sincerely,

Name and Title of Person Signing	Mickael ROBIC
Date	17/01/2023
Signature	, in the second se