

## Cover Letter – Request to Add Part 25 SCS Designation

Federal Communications Commission  
Office of Engineering and Technology  
Laboratory Division  
7435 Oakland Mills Road  
Columbia, MD 21046

Re: **[Wingtech Group (Hong Kong) Limited, FCC ID: 2APXW-TMRV075G],**  
Request to Add Part 25 Supplemental Coverage from Space Designation

To Whom it May Concern:

By the associated FCC Form 731, we request that the FCC add FCC Rule Part 25 supplemental coverage from space (“SCS”) capability to the device referenced above. We also seek to take advantage of the process that the FCC established in the Report and Order released on March 15, 2024, in GN Docket No. 23-65 and IB Docket No. 22-271 (FCC 24-28) for waiver of Sections 2.1043(c), 2.911(c), and 2.911(e) of the rules.

Our intent is to add SCS capability to the device through a software update only; there will be no hardware changes. Further, no radiofrequency emissions have changed. Finally, we have attached the attestation required by Sections 2.911(d)(5) and (7) of the FCC’s rules.

If there are any questions, please contact the undersigned directly.

\_\_\_\_\_ *Rui Sha* \_\_\_\_\_ [Signature]

[Name] Rui Sha

[Title] Manager

[Manufacturer Name] Wingtech Group (Hong Kong) Limited

Dated: 2024/10/8

Certification Attached

## Certification -- Request to Add Part 25 SCS Designation

### CERTIFICATION

The undersigned hereby certifies that (i) as of the date of the submission by **[Wingtech Group (Hong Kong) Limited]** (the "Applicant") for certification of **[2APXW-TMRV075G]** to add supplemental coverage from space, the equipment is not prohibited from receiving an equipment authorization pursuant to Section 2.903 of the rules; and (ii) the Applicant is not identified on the Covered List established pursuant to Section 1.50002 of the rules as an entity producing covered communications equipment.

The Applicant further certifies (i) that it has identified below its designated agent for service of process in the United States; (ii) its consent and its designated agent's (if applicable) obligation to accept service of process in the United States for matters related to the applicable equipment, and at the physical U.S. address of the designated agent; and (iii) its obligation to maintain an agent for service of process in the United States for no less than one year after either the grantee has permanently terminated all marketing and importation of the applicable equipment within the U.S., or the conclusion of any Commission-related administrative or judicial proceeding involving the equipment, whichever is later.

Applicant

Rui Sha [Signature]

[Name] Rui Sha

[Title] Manager

[Manufacturer Name] Wingtech Group (Hong Kong) Limited.

FRN #: 0027561653

[U.S. Physical Address]

[U.S. Mailing Address (if different)]

[E-Mail] sharui@wingtech.com

[Telephone number] +86-21-53529900

Dated: 2024/10/8

Agent for Service of Process\*

James Yoon [Signature]

[Name] James Yoon

[Title] Quality Manager

[Name of Agent for Service of Process] WINGTECH  
INTERNATIONAL, INC.

FRN #: 0033455775

[U.S. Physical Address] 21900 Oakview Lane  
Cupertino/California

[U.S. Mailing Address (if different)]

[E-Mail] james.yoon@na.wingtech.com

[Telephone number] 425-365-8532

Dated: 2024/10/8

\* May be omitted if the Applicant is located in the United States and designates itself as the agent for service of process for matters related to the equipment. Otherwise, an Applicant must have a United States designated agent for service of process.