

Cleer Limited

UNITS 2706 27/F SHUI ON CENTRE NOS.6-8 HARBOUR ROAD WANCHAI HK China

Attestation Statements

To: Federal Communications Commission

Date: Aug. 29, 25

7435 Oakland Mills Road,
Columbia, MD 21046, USA

Subject: Attestation of Compliance with FCC Covered List Software Requirements

FCC ID: 2ATS91518E

Product Name: Open Ear AI Headphones

This letter serves as an attestation that the equipment identified above **is not** (select one) "covered" software as defined under the Federal Communications Commission (FCC) Covered List requirements, as outlined in **FCC 22-84** and **KDB 986446**.

Specifically, the undersigned certifies that the equipment for which authorization is sought:

1. **Does not contain** cybersecurity or anti-virus software produced or provided by **Kaspersky Lab, Inc.** or any of its successors, assignees, parents, subsidiaries, affiliates, or any entity that has rebranded or relabeled software produced by the aforementioned entities.
2. **Does not have the capability** to store, run, or deliver any software identified on the FCC Covered List, including but not limited to cybersecurity and anti-virus software.

To support this attestation, the appendix evaluation documentation has been prepared and is included in the certification filing.

This attestation is based on a thorough evaluation of the device's design, functionality, and software environment. The undersigned affirms that the information provided is accurate and complete to the best of their knowledge.

Sincerely yours,

Siyan Huang

Applicant Signature

Printed Name: Siyan Huang

Title: Certified Engineer

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Evaluation regarding to the Covered List Software:			
Compliance Methodology	Evaluation Process		Results
Device is Inherent compliance	☒	The Chipset(s) used is limited to run the Cybersecurity or anti-virus software.	Compliance
	☒	The Memory used is limited to run the Cybersecurity or anti-virus software.	Compliance
	☒	There is storage capacity limitation for store or install the Cybersecurity or anti-virus software.	Compliance
	☒	Operating system used is limited to run, install or deliver the Cybersecurity or anti-virus software.	Compliance
Device is not Inherent compliance	☐	Evaluation Based on Software Bill of Materials (SBoM)	See attached "SBoM" Note:The SBoM content is limited to the scope of covered list software (e.g. antivirus and cybersecurity software).
	☐	Evaluation Based on Scan for Software on the device	
	☐	Evaluation Based on Filesystem scan	
	☐	Evaluation Based on Running software check	