



Totem Inc
1428 Williams St, Suite Q
Chattanooga, TN 37402 USA

April 17th, 2025

REF: FCC Class 2 Permissive Change for Minimum Separation Distance (Host-Specific – Model 1001)

In reference to the FCC application under **FCC ID 2BMQS-1** and in accordance with the guidelines for certified modules contained in **KDB 996369 D01 Module Certification Guide v04r02**, **Totem Inc.** requests a **Class 2 Permissive Change (C2PC)** to permit the transmitter antenna to be used at a reduced separation distance of **15mm from the body**.

The original Equipment Authorization grant listed the required separation distance as **20cm** for mobile device status. However, our device is a **portable, body-worn product**, and the antenna location is securely fixed within the product housing.

We have completed the required **RF exposure and SAR testing** to demonstrate compliance with FCC standards at the reduced separation distance, and copies of the supporting test reports are included with this filing.

This C2PC is **host-specific** and applies **only to integration into our device with model number: **Host Model Number: 1001**

The certified module has been integrated onto a custom Totem Inc. printed circuit board (PCB), which does not introduce any additional oscillators or transmitting elements. Schematic and block diagrams for our custom PCB are included in the submission for reference.

Please feel free to contact me at the email address below should any additional information be needed.

Best regards,

Eric Worth

Eric Worth
Product Manager
Totem
eric@totemlabs.com