

Date: 2016-04-15

To Whom It May Concern

Subject: reuse of test data

Applicant: OFI, Inc. (operating as 2D2C Inc.)
FCC ID: S9C-3065-3

Dear Sir/Madam:

We, the undersigned, hereby attest to the fact that the 3065-3 Control Board for which we are seeking LMA differs in no consequential way from the relevant separable sub-block of the previously-certified 3064 module (FCC ID S9C-3064). In particular:

- The previous 3064 module was composed of the previous "3065" Control Board along with a daughterboard containing a 2.4 GHz ZigBee radio. The 3065 board itself contained the close-range 13.56 MHz RFID transmitter. Thus, in considering the previous 3064 module with the ZigBee radio removed (not mounted), we are left with the previous 3065 board containing the RFID transmitter.
- The entire RFID circuit block of the "new" 3065-3 Control Board including reader chip (ST CR14, with fixed ISO14443 protocol), antenna matching/attenuation circuit, and PCB trace antennas is *identical in specification and layout* to that of the previous 3065 board (sub-block of previous 3064 module). As well, the firmware subsystem that invokes RFID scans does so at the same rate (7.5Hz) and has remained unchanged.
- The other non-RFID blocks of the "new" 3065-3 Control Board (see the Block Diagram exhibit) are *identical* in specification and *almost identical* in layout to that of the previous 3065 board. In particular, the layout differences are (see Photos exhibits):
 - Two traces that carry signals from the primary microcontroller to the pads PB4 and PB5 for the optional daughterboard are now routed on the top of the board for intervals of approximately 15 mm (between U2 and the cutout).
 - Pads and traces added for future inclusion of relay flyback diodes D9 and D10 (near edgeslots P1 and P2 at bottom edge of board) (not currently populated). (Also see Schematic exhibit.)
 - Pads and traces added for direct mounting/soldering of (obsolete) ZigBee radio module and support components (where daughterboard normally mounted at lower left corner of board) (never implemented, not currently populated). (Also see Schematic exhibit.)

Thus the originally-filed test data for the RFID transmitter of the previously-certified 3064 module (UltraTech's File No.: OFI-015_F15C225) are expected to accurately represent the RFID transmitter of the "new" 3065-3 Control Board for which we are seeking LMA.

(Incidentally, we also understand the changes to the non-RFID blocks are subject to 15B testing.)

Regards



Geoff Jones