

Date: 6/4/2025

Attn: FCC Office of Engineering and Technology / UL Verification Services TCB

Ref: C2PCPX for FCC ID: VN5-CN

Original approval date: June 15, 2021

Applicant: Ascensia Diabetes Care US Inc.

To Whom It May Concern

This letter is to request a C2PCPX change to implement the following proposed updates to the hardware of the device:

The currently approved Toshiba BLE IC (as part of VN5-CN) is reaching end-of-life and will be replaced by the proposed Silicon Labs BLE IC.

In conjunction with the IC replacement, supporting peripheral components will be updated. This will result in a minor board layout update to accommodate the new BLE IC. The functionality of the RFE block remains unchanged and is not impacted by these modifications.

Additional technical details are provided in the accompanying schematics, block diagram, and photographic exhibits.

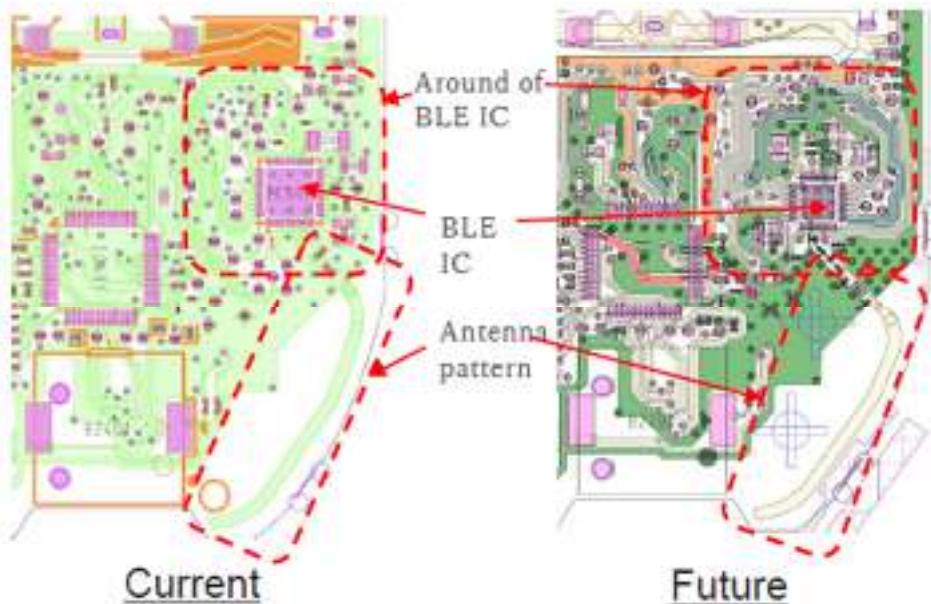


Figure 1: Area of PCB Impacted by Change

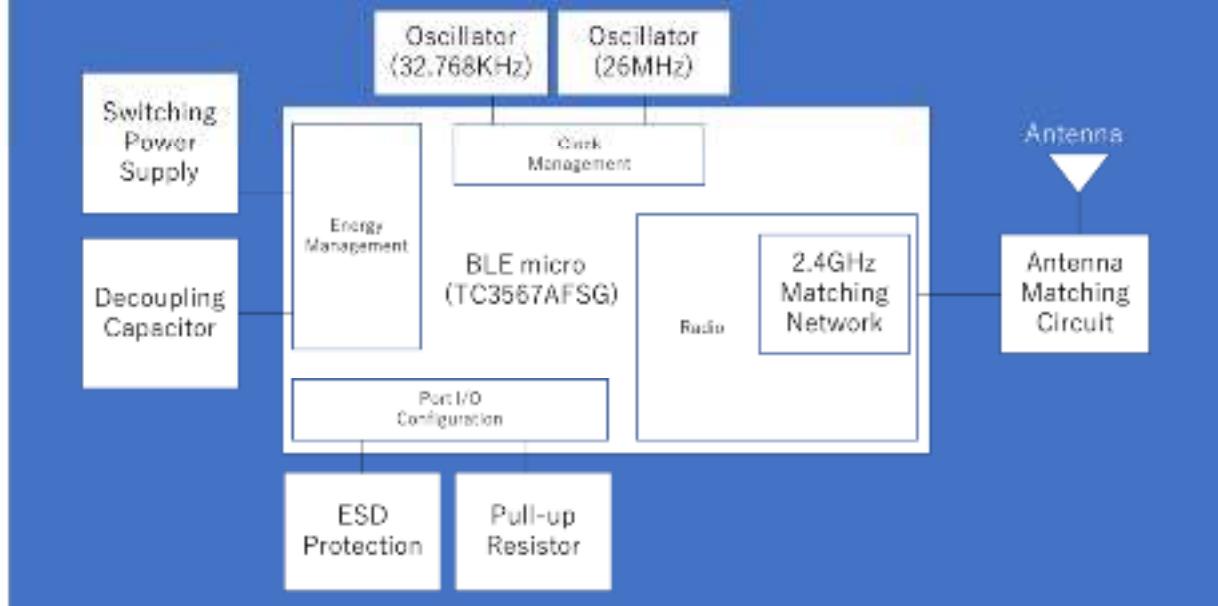
**RFE block (Toshiba)**


Figure 2: RFE Block of Toshiba BLE IC (current)

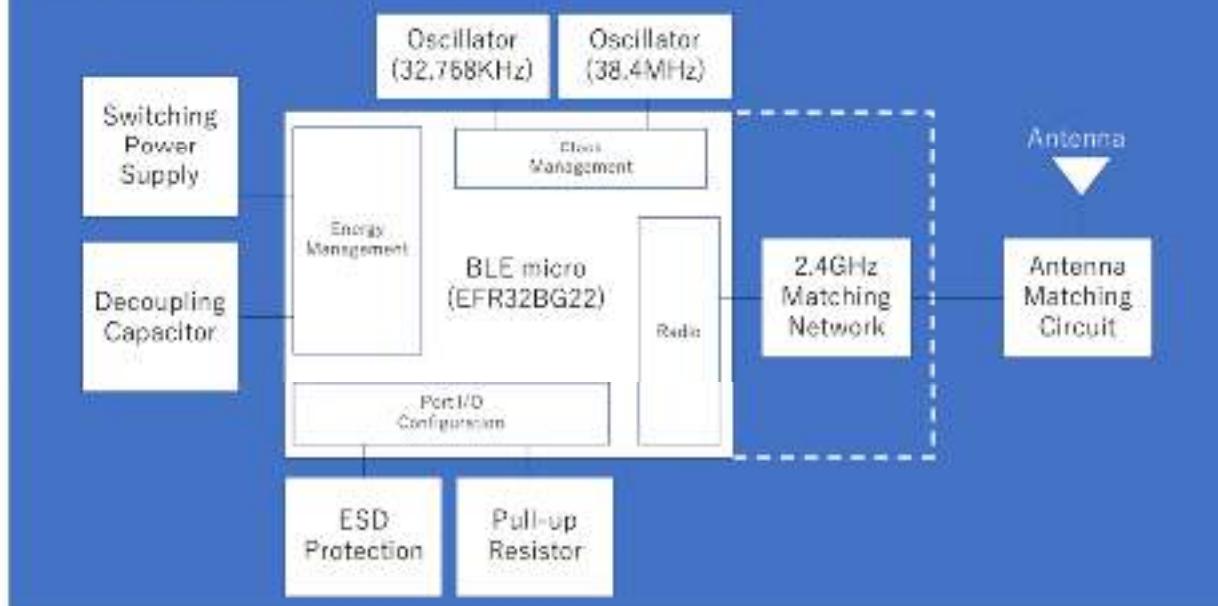
**RFE block (Silicon Labs)**


Figure 3: RFE Block of Silicon Labs BLE IC (proposed)



Pursuant to the information provided, Ascensia Diabetes Care affirms that our product fulfills the following criteria:

1) The requirements of § 2.1043 are fulfilled, i.e., the device's block functions for the fundamental frequency, primary modulator circuit, maximum power, or field strength ratings shall remain unchanged	Confirmed
2) Transmitter PCB layout and parts changes are only permitted if there is no change in identifying a device's form, functional specification, as initially granted or previously approved under a Class II permissive change.	There are no changes to device's form and functional specification.
3) PCB changes are limited to non-substantive modifications layout changes to the same size physical circuit board previously granted.	<p>It is a physical circuit board of the same size as the one previously granted.</p> <p>The PCB layout has been changed but non- substantial modifications.</p>
4) C2PCPX is not permitted to add, remove, augment, or change capabilities, such as transmitters, increased bandwidth, additional rule parts, bands, etc.	No changes to the transmitter parameters, rule parts, operational bands, power or bandwidth. The original device only supported BLE and the change under this C2PCPX continues to only support BLE
5) In the PAG submission for item C2PCPX, the applicant shall provide complete information on testing demonstrating that the proposed changes for fundamental emissions are unchanged within the normal, acceptable tolerances and out-of-band; emissions do not exceed the appropriate limits.	Confirmed (see test reports)

6) The modified device shall not be marketed under the existing grant of certification before confirmation that the C2PCPX PAG is approved and granted.	Confirmed, sale of the modified device will not occur until the C2PCPX PAG is approved and TCB issues the grant.
7) Software Defined Radio (SDR) grants that use the C2PCPX procedure are not permitted to make subsequent Class III permissive changes.	Not applicable
8) The C2PCPX PAG procedure has no impact on the provisions of V) of this publication for non-SDR software-only changes; thus, adding an equipment class when related to rule changes is still permitted.	Not applicable
9) Class I permissive changes are not permitted under this C2PCPX procedure.	Not applicable

If you have any questions regarding this application, please feel free to contact me.

Sincerely yours,



Ben Hostetler  
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