

To: Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046
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20-02-2025

Certification Application Attestation Statements

Testo SE & Co. KGaA
Celsiusstrasse 2
79822
Titisee-Neustadt, Germany

Subject: **FCC ID: WAF-05600860**

To Whom It May Concern:

Statement for 47 CFR section 2.911(d)(5)(i)

Testo SE & Co. KGaA certifies that as of the date of the application the equipment for which authorization is sought is not "covered" equipment¹ prohibited from receiving an equipment authorization pursuant to section 2.903 of the FCC rules.

If the equipment for which the applicant seeks authorization is produced by any of the entities identified on the current Covered List, including affiliates or subsidiaries of the named companies, the applicant must include an explanation on why the equipment is not "covered" equipment.

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Additional Explanation:

The testo 860i is a thermal measuring and imaging instrument that measures the heat emitted by objects or areas. It also includes a separate camera to capture visual images. The device itself is not able to display the thermal or visual images, as it does not have a display screen. Without an additional smart device (tablet or smartphone) connected via the testo Smart App, it is not able to perform functions related to public safety, government facility security or critical infrastructure monitoring. The testo860i takes thermal and visual images, which are transmitted as a video stream with 9 images per second to the testo Smart App when the testo 860i is turned on, in record mode and connected to the Testo SmartApp. However, no videos can be saved on the 860i or the Testo SmartApp. The video transmission only works when the testo 860i is transmitting the live stream to the Testo SmartApp, so that the user can then select the desired image and save the individual image in the app.

The device can only take thermal and visual images in order to combine visual appearance and heat measurements in the testo Smart App. The user must separately download and install the testo Smart App on a smartphone or tablet of their choice and then use the testo Smart App to display the video stream on the screen of the smart device. The images can only be saved as individual still images in the smart device by pressing the capture button in the testo Smart App. The testo 860i has a single button to turn the device on and off. All other functions can only be operated via the user interface provided via the proprietary testo Smart App.

Testo has implemented extensive security measures to ensure testo 860i's compliance with FCC rules. The testo 860i features radio hardware components designed by Hikmicro (a subsidiary of Hangzhou Hikvision Digital Technology Company). There is a Bluetooth and WLAN communication integrated. The Bluetooth communication is just used to create a wireless local-area network (WLAN). The wireless local-area network (WLAN) communicates the testo 860i's measurement data to the nearby device on which the Testo SmartApp is

¹ - The Commission's [Covered List](https://www.fcc.gov/supplychain/coveredlist) is published by the Public Safety and Homeland Security Bureau and posted on the Commission's website. This Covered List, which is periodically updated, identifies particular equipment, produced by particular entities, that constitutes "covered" equipment. <https://www.fcc.gov/supplychain/coveredlist>.

(2): For FCC it must be the Grantee Code "owner" or the authorized agent.

(3): double click on the appropriate box and select "checked" then "OK"

installed. Hikmicro also designed the operating firmware installed on the testo 860i which it uses in order to perform these communications functions. However, Hikmicro's involvement is limited to these specific components. Testo was entirely responsible for developing the Testo SmartApp, ensuring Hikmicro had no role in its development. The Testo SmartApp can operate with several Testo products and was not specifically designed for testo 860i. In addition to the limited functionality of the testo 860i, this limited scope of involvement by Hikmicro further supports the argument that the testo 860i is not "covered" equipment under FCC rules.

Each testo 860i unit is assigned an individual authentication key which is tied to the unit's unique serial number. The Testo SmartApp uses that key to authenticate the testo 860i device and also uses WPA2 and AES-128 encryption implemented by Testo to encrypt all communications between the testo 860i and the device on which the Testo SmartApp is installed. Testo has performed security checks by carrying out test cases to ensure that no communication takes place other than with the Testo SmartApp.

As a result, although the testo 860i incorporates hardware and firmware developed by Hikmicro, the testo 860i is not functionally operable without the Testo SmartApp. Therefore, as a standalone device, it is incapable of performing any functions related to "the purpose of public safety, security of government facilities, physical security surveillance of critical infrastructure, and other national security" as stated in the Section 2 designation for Hangzhou Hikvision Digital Technology Company. To the extent that any user might seek to utilize a testo 860i together with the Testo SmartApp in order to perform any of the aforementioned activities (within the limited functionalities described above), the Testo SmartApp would be actually responsible for performing those activities and Hikmicro was not involved in developing the Testo SmartApp in any manner. Additionally, as previously described, Testo has implemented extensive security measures to protect the Testo SmartApp from unauthorized access.

In conclusion, the testo 860i is a thermal imaging device with limited functionality that is fundamentally dependent on the Testo SmartApp for operation. The device itself is incapable of performing any functions related to public safety, security of government facilities, physical security surveillance of critical infrastructure, or other national security purposes, at least without the Testo SmartApp. Hikmicro's involvement is strictly limited to the design of the radio hardware components and the operating firmware necessary for establishing a WLAN connection to transmit measurement data. Testo has independently developed the Testo SmartApp and implemented robust security measures, including WPA2 and AES-128 encryption, to ensure secure communication between the testo 860i and the user's device. These measures, along with security checks, confirm that the testo 860i does not constitute "covered" equipment as defined by the FCC's Covered List. Therefore, the device in Testo's view is not subject to the prohibitions outlined in Section 2.911(d)(5)(i).

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Statement for 47 CFR section 2.911(d)(5)(ii)

Testo SE & Co. KGaA ("the applicant") certifies that, as of the date of the filing of this application, the applicant

☐ - is / ☒ - is not ⁽³⁾

identified on the Covered List as an entity producing "covered" equipment.

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Revision Record Sheet:

Revision	Section number	Page number	Date	Remark(s)	issued by
01			07-02-2023	1 st version	RvM
02		1	15-02-2023	Changed Applicant to Company and added "Subject: FCC ID: "	RvdM

Issued/modified by : Richard van de Meer
Function : Certification assessor
Revision : 02
Date : 15-02-2023

Verified by : Willem Jan Jong
Function : Team Lead
Date : 16-02-2023

Released by : Axel Gase
Function : Manager Quality Assurance
Date of release: : 19-02-2023