



To: Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046
USA

Date: 2023/06/02

**Subject: Compliance to Items 1 ~ 9 of KDB Publication 178919
Attachment Notification 202109-001 subject to PAG C2PCPX**

FCC ID: XS5-CAPMX
Grant Date(s): 12/04/2020

The Grantee Andrew Wireless (Grantee Code: XS5) hereby acknowledges compliance with KDB Publication 178919 Attachment Notification 202109-001:

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.

- Requirement fulfilled because the Block Diagram and the certified RF parameters remain identical. Discontinued electronic components (here transistors of the Linear Power Amplifier board) have been exchanged with equivalent carefully selected components so that the necessary PCB layout changes kept to a minimum.
Uploaded Block Diagram, Schematics, Parts List, PCB layout document in detail the performed modifications – where the test reports confirm unchanged RF parameters.

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.

- Requirement fulfilled – the overall appearance of the PCB remains the same. Neither the shape nor the size of the entire PCB varies to the original certified device. The component changes require slightly PCB layout adaptations, that are documented in detail with the internal photos and PCB layouts.
Uploaded schematics and parts list document the parts exchanges.

3) PCB changes are limited to non-substantive modifications layout changes to the same size physical circuit board previously granted.

- Requirement fulfilled because the overall appearance of the PCB remains the same than the originally certified one. Neither size nor shape of the PCB varies. Replaced components carefully selected to keep necessary PCB layout adaption to the minimum. Submitted internal photos clearly show the layout changes only related to the exchanged electronic components.

4) C2PCPX is not permitted to add, remove, augment, or change capabilities, such as transmitters, increased bandwidth, additional rule parts, bands, etc.

- Requirement fulfilled because the certified RF parameters remain unchanged. The uploaded C2PC test reports show similar test results compared to the original test reports.

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.

The PAG submission shall include all applicable test reports and internal photos.

- Requirement fulfilled: Test Reports and Test Setup Photos for each individual modified frequency band showing compliance to Output Power, Zone Enhancer Gain, Occupied Bandwidth, Input-versus Output Spectrum, Out-of-bounds Emissions and Out-of-Band Refection uploaded.

There are Internal Photos uploaded that allow a general comparison of the overall PCB and a detailed comparison of the individual portions for each frequency band.

6) The modified device shall not be marketed under the existing grant of certification before confirmation that the C2PCPX PAG is approved and granted.

- Requirement fulfilled: Grantee awaits approval of this C2PCPX PAG to start marketing of the modified devices.

7) *Software Defined Radio (SDR) grants that use the C2PCPX procedure are not permitted to make subsequent Class III permissive changes.*

- Requirement is NOT applicable because the device (Equipment Class B2I + B9B) is not certified as a Software Defined Radio (SDR).

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.*

- Requirement fulfilled because the modified device remains identical RF parameters and functionalities as originally certified and documented with the uploaded C2PC test reports.

9) *Class I permissive changes are not permitted³ under this C2PCPX procedure.*

- Requirement fulfilled and C2PCPX applied for documented modifications.

Sincerely

R&T Assistant & Authorized Agent