

Notification 202109-001 Response

Revision 1

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This document provides Class II permissive change filing acknowledging compliance to the preceding items 1) through 9), manufacturer response italicized:

- 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.

Complies, see associated test report. The product is equipped with a new synthesizer and associated component to ensure compliance, no features are changed.

- 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.

Complies, see associated test report. No change has been made to the size of the product or outward appearance.

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

Complies, the size of the circuit board has not changed.

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

Complies, there are no changes to product features due to the change in synthesizer.

- 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.

Complies, see associated test report which includes photos.

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

Complies, at the time of writing, the new product has not been released for supply to the market, this will not occur until after receipt of the grant of authorization.

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

Complies, the Aprisa SR+ family of products, are not certified as 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.

Complies, software changes are confined to embedded code that programs the new

synthesizers and does not provide any additional controls as specified in KDB 178919 D01 Permissive Change Policy v06, section V (A).

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

Complies, application is made under Class II permissive change (C2PC).