



04/01/2023

Telecommunication Certification Body
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Subject: Class 2 Permissive Change (C2PC) Request

FCC ID: 2A8ZW-COMMANDER

To whom it may concern

In accordance with KDB 178919 D01 and FCC rule part §2.1043: Changes in Certified Equipment, GAI-Tronics (a division of Hubbell Ltd.) hereby requests a Class 2 permissive change to FCC ID: 2A8ZW-COMMANDER as detailed below:

1. The module is integrated into the host products listed below. All hosts utilise the same RF module & antenna. All have the same form factor, and the variations between each are limited to the number of buttons 0, 6 & 18, handset cord length and microphone dynamic or noise cancelling. The model 231-02-304J-612 used for testing has the maximum number of buttons and longest handset cord.
 - 231-02-304J-612
 - 231-02-3046-612
 - 231-02-3040-612
 - 231-02-304J-112
 - 231-02-3046-112
 - 231-02-3040-112
 - 231-02-304J-212
 - 231-02-3046-212
 - 231-02-3040-212

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2. The host products are band limited to LTE bands 2,4,5,12 & 66. These are limited in the firmware and cannot be changed by the user.
3. Addition of 2J Antennas 2J5224P to supported antenna list. The 2J5224P is a 4G LTE/3G/2G adhesive mounted compact high-performance antenna with the following peak gain characteristics read from the graph on the antenna data sheet.

Band	Frequency	Peak Gain (dBi)
2	1900MHz	5.0
4	1700MHz	4.2
5	850MHz	2.8
12	700MHz	1.0
66	1700MHz	4.2

4. The application is changing the module use from mobile to portable.

As a result of the changes detailed above, spurious emission and band edge testing have been performed along with an RF exposure evaluation from mobile to portable use in accordance with the following rule parts.

1. FCC 22.917
2. FCC 24.238(a)
3. FCC 27.53(g) & 27.53(h)(1)
4. FCC 47 CFR part2 (2.1093)

Yours faithfully,

Rumsby,
Richard

Digitally signed by
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Date: 2023.01.04
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Richard Rumsby
Engineering Manager
C2P2 Permissive Change Letter