

De: oetech@fcc.gov <oetech@fcc.gov>

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Para: Rafael Alcalde Uceda <rafael.alcalde@dekra.com>

Asunto: Response to Inquiry to FCC (Tracking Number 266672)

Inquiry on 06/05/2025 :

Inquiry:

Dear FCC Office of Engineering and Technology (OET) Laboratory Division,
Is it possible for the manufacturer of a cellular module to have two different FCC IDs for the same module (identical hardware and software), for commercial reasons?

Essentially, they intend to sell the module (with FCC ID: XXXabcde) to host manufacturer A, who will label it with ?Contains FCC ID: XXXabcde.?
They also plan to sell the same module to another host manufacturer B, but with a different FCC ID: XXXfghij. Manufacturer B would label it with ?Contains FCC ID: XXXfghij.?

If this is possible, we believe the appropriate procedure would be to apply the KDB for Referencing Test Data, and we assume no additional testing would be required for this process.

We would appreciate your advice.

Best regards,
Rafael Alcalde
Dekra Testing and Certification SAU

FCC response on 06/05/2025

Thank you for your inquiry.

This would be allowed under §2.933 (Change in identification of equipment), data referencing is not applicable. Requirements are outlined in 2.993 and KDB publication 249634.

Attachment Details: