

Justification for Re-use of radio test results

We, **Audeze LLC.**, believe the original test reports for model Penrose X TX (FCC ID: 2APRZ-PENROSEXTX, IC: 23865-PENROSEXTX) can be reused for the current model Penrose P TX, (FCC ID: 2APRZ-PENROSEPTX, IC: 23865-PENROSEPTX) as the following reason:

The only difference between them is that Penrose X TX has one more built-in a Secure IC; however, this change does not affect RF characteristics and the two models are electrically identical.

Penrose X TX contains Microsoft Secure IC(U7)
Penrose P TX is without Microsoft Secure IC(U7)

Radiated spurious emission re-tested, conducted signal totally test re-used

The Secure IC is a pre-configured and pre-provisioned secure element of security focused devices. According to KDB 484596 D01, only RSE spot check was verified for the series model Penrose P TX.

FCC Part	Reference ID	Report No.	Justification of re-use
15.247, RSS-247	FCC ID: 2APRZ-PENROSEXTX, IC: 23865-PENROSEXTX	CN20KPRL (RSS247-2.4G) 001 CN20UE25 (P15C-2.4G) 001	See above

Signature  Date: 2020-11-13

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