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Test Data Attestation Letter – FCC

FCC ID: 2AV57GDSBA1

This letter serves to confirm that **Geotab Inc.** is reusing test data for the LTE Cat1-bis module **DLUS-WI01-NA** (OEM: GC02S1-NA2), originally certified under **FCC ID: NKR-DLUSWI01NA** (OEM FCC ID: 2AAGMGC02SA) by **WNC Corporation** (OEM: Sequans Communications). The module is being integrated without modification into the end-product identified as **GDSBA1**.

Please refer to the enclosed Operational Description exhibit for a comprehensive list of supported frequency bands. There have been no changes to the originally certified module, except for an alternative antenna use.

The following test reports have been reviewed and are deemed valid, representative of the module's performance within the GDSBA1 product, and compliant with current FCC requirements:

Technology	Report ID	Issue date	Rule Part
LTE Band 5	75461RRF.001	November 9, 2023	22H
LTE Band 2, 25	75461RRF.002	November 9, 2023	24E
LTE Bands 4, 12, 13, 66	75461RRF.003	November 8, 2023	27
LTE Band 14	75461RRF.004	November 8, 2023	90R

In addition, new radio testing with the new antenna has been conducted to demonstrate continued compliance of the integrated cellular module, which also includes a **Bluetooth Low Energy (BLE)** radio. **Radiated Spurious Emissions (RSE)** testing was performed for **CAT1-bis** module in conjunction with BLE to validate simultaneous transmission compliance.

The GDSBA1 incorporates a custom antenna design to support the combined radio system of the product (see attached datasheet). From the cellular standpoint and the approved module:

- The WNC Corporation (OEM: Sequans) module certification is based on the following antenna gains: 2 dBi (sub-1 GHz) and 2.4 dBi (above 1 GHz).
- The GDSBA1 antenna design achieves the following antenna gains: 2.3 dBi (sub-1 GHz), and 2.8 dBi (above 1 GHz).

An analysis of the antenna change has determined the following:

- FCC Part 22H (B5 – 840 MHz): The new antenna gain is 0.3 dB higher, but there is sufficient ERP margin in the original report to accommodate increase of gain. ERP limit is 7 W (38.45 dBm) and the original assessment maximum level measured was 22.75 dBm (conducted). $22.75 \text{ dBm} + 2.3 \text{ dBi (new antenna)} = 25.05 \text{ dBm EIRP}$ or 22.90 dBm ERP which is 15.55 dB margin below the limit. Radiated testing with new antenna demonstrate continued compliance.
- FCC Part 24E (B2, B25 – 1900 MHz): The new antenna gain is slightly higher than the original, but there is sufficient EIRP margin in the original report to accommodate this. EIRP limit is 33 dBm and the original assessment maximum level measured was 22.65 dBm (conducted). $22.65 \text{ dBm} + 2.8 \text{ dBi (new antenna)} = 25.45 \text{ dBm} = 7.55 \text{ dB margin}$ below the limit. Radiated testing with new antenna demonstrate continued compliance.
- FCC Part 27 (B4, B66 – 1700 MHz and B12, B13 – 700 MHz): Similarly, there is gain increase within acceptable limits based on the original report for above 1 GHz. EIRP limit is 30 dBm and the original assessment maximum level measured was 22.93 dBm (conducted). $22.93 \text{ dBm} + 2.8 \text{ dBi (new antenna)} = 25.73 \text{ dBm} = 4.27 \text{ dB margin}$ below the limit. The new antenna gain has 0.3 dB increase which is within acceptable limits based on the original report for bands below 1 GHz. ERP limit is 3 W (34.77 dBm) and the original assessment maximum level measured was 23.23 dBm (conducted). $23.23 \text{ dBm} + 2.3 \text{ dBi (new antenna)} = 25.53 \text{ dBm EIRP}$ or 23.38 dBm ERP which is 11.39 dB margin below the limit. Radiated testing with new antenna demonstrate continued compliance.
- FCC Part 90R (B14 – 790 MHz): The new antenna gain has 0.3 dB increase is within acceptable limits based on the original report for bands below 1 GHz. ERP limit is 3 W (34.77 dBm) and the original assessment maximum level measured was 23.07 dBm (conducted). $23.07 \text{ dBm} + 2.3 \text{ dBi (new antenna)} = 25.37 \text{ dBm EIRP}$ or 23.22 dBm ERP which is 11.55 dB margin below the limit. Radiated testing with new antenna demonstrate continued compliance.

Signed:

A handwritten signature in black ink, appearing to read 'Adelberg' followed by a stylized flourish.

Printed name: Andrey Adelberg

Title: Project Manager, Global Market Access (GMA); Wireless Expert