Shenzhen Xtooltech Intelligent Co., Ltd.

17&18/F, A2 Building, Creative City, Liuxian Avenue, Nanshan District, Shenzhen, China

Attestation Statements

To: Federal Communications Commission **Date: Dec. 29, 2025**

7435 Oakland Mills Road,

Columbia, MD 21046, USA

Subject: Attestation of Compliance with FCC Covered List Software Requirements
FCC ID: 2AW3IP102A
Product Name: Smart Diagnostic System

This letter serves as an attestation that the equipment identified above ☐ **is /** ☒ **is not** (select one) "covered" software as defined under the Federal Communications Commission (FCC) Covered List requirements, as outlined in **FCC 22-84** and **KDB 986446**.

Specifically, the undersigned certifies that the equipment for which authorization is sought:

1. **Does not contain** cybersecurity or anti-virus software produced or provided by **Kaspersky Lab, Inc.** or any of its successors, assignees, parents, subsidiaries, affiliates, or any entity that has rebranded or relabeled software produced by the aforementioned entities.
2. **Does not have the capability** to store, run, or deliver any software identified on the FCC Covered List, including but not limited to cybersecurity and anti-virus software.

To support this attestation, the appendix evaluation documentation has been prepared and is included in the certification filing.

This attestation is based on a thorough evaluation of the device's design, functionality, and software environment. The undersigned affirms that the information provided is accurate and complete to the best of their knowledge.

Sincerely yours,

Applicant Signature

Printed Name: Pink Zou

Title: manager

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Evaluation regarding to the Covered List Software:			
Compliance Methodology	**Evaluation Process**		**Results**
Device is Inherent compliance	☐	**The Chipset(s)** used is limited to run the Cybersecurity or anti-virus software.	Compliance
	☐	**The Memory** used is limited to run the Cybersecurity or anti-virus software.	Compliance
	☐	There is **storage capacity** limitation for store or install the Cybersecurity or anti-virus software.	Compliance
	☐	**Operating system** used is limited to run, install or deliver the Cybersecurity or anti-virus software.	Compliance
Device is not Inherent compliance	☒	Evaluation Based on **Software Bill of Materials (SBoM)**	See attached "SBoM" Note:The SBoM content is limited to the scope of covered list software (e.g. antivirus and cybersecurity software).
	☐	Evaluation Based on **Scan for Software on the device**	
	☐	Evaluation Based on **Filesystem scan**	
	☐	Evaluation Based on **Running software check**	

P102

SBOM (Software Bill of Materials) [For Device is not Inherent compliance]			
Section	**Component Name**	**Version**	**Supplier**
1	Full system	5.7.57	XTOOL
2	Auto VIN	5.7.57	XTOOL
3	Read ECU Info	5.7.57	XTOOL
4	Read code	5.7.57	XTOOL
5	Clear code	5.7.57	XTOOL
6	Read live data	5.7.57	XTOOL
7	Read freeze frame	5.70	XTOOL
8	Actuation test	5.70	XTOOL
9	ECU Configuration	20.02	XTOOL
10	Programmable module installation	20.02	XTOOL

H6Pro 3

SBOM (Software Bill of Materials) [For Device is not Inherent compliance]			
Section	**Component Name**	**Version**	**Supplier**
1	Full system	5.7.57	XTOOL
2	Auto VIN	5.7.57	XTOOL
3	Read ECU Info	5.7.57	XTOOL
4	Read code	5.7.57	XTOOL

5	Clear code	5.7.57	XTOOL
6	Read live data	5.7.57	XTOOL
7	Read freeze frame	5.70	XTOOL
8	Actuation test	5.70	XTOOL
9	TPMS Functions	5.70	XTOOL
10	Full special function	5.70	XTOOL
11	ECU Configuration	20.02	XTOOL
12	BMW TEST PLAN	20.93	XTOOL
13	Offline Coding	20.02	XTOOL
14	Programmable module installation	20.02	XTOOL
15	Online ECU Coding	5.20	XTOOL
16	Online ECU Programming	5.20	XTOOL
17	Key Programming	21.00	XTOOL

H6DPro 3

SBOM (Software Bill of Materials) [For Device is not Inherent compliance]			
Section	**Component Name**	**Version**	**Supplier**
1	Full system	5.7.57	XTOOL
2	Auto VIN	5.7.57	XTOOL
3	Read ECU Info	5.7.57	XTOOL
4	Read code	5.7.57	XTOOL
5	Clear code	5.7.57	XTOOL
6	Read live data	5.7.57	XTOOL
7	Read freeze frame	5.70	XTOOL
8	Actuation test	5.70	XTOOL
9	Full special function	5.70	XTOOL
10	ECU Configuration	20.02	XTOOL
11	Offline Coding	20.02	XTOOL
12	Programmable module installation	20.02	XTOOL
13	Online ECU Coding	5.20	XTOOL
14	Online ECU Programming	5.20	XTOOL

AutoProPAD G3 Prime

SBOM (Software Bill of Materials) [For Device is not Inherent compliance]			
Section	**Component Name**	**Version**	**Supplier**
1	Full system	5.7.57	XTOOL
2	Auto VIN	5.7.57	XTOOL
3	Read ECU Info	5.7.57	XTOOL
4	Read code	5.7.57	XTOOL
5	Clear code	5.7.57	XTOOL
6	Read live data	5.7.57	XTOOL
7	Read freeze frame	5.70	XTOOL
8	Actuation test	5.70	XTOOL

9	Full special function	5.70	XTOOL
10	Programmable module installation	20.02	XTOOL
11	Key Programming	21.00	XTOOL

IP919

SBOM (Software Bill of Materials) [For Device is not Inherent compliance]			
Section	**Component Name**	**Version**	**Supplier**
1	Full system	5.7.57	XTOOL
2	Auto VIN	5.7.57	XTOOL
3	Read ECU Info	5.7.57	XTOOL
4	Read code	5.7.57	XTOOL
5	Clear code	5.7.57	XTOOL
6	Read live data	5.7.57	XTOOL
7	Read freeze frame	5.70	XTOOL
8	Actuation test	5.70	XTOOL
9	Full special function	5.70	XTOOL
10	ECU Configuration	20.02	XTOOL
11	Offline Coding	20.02	XTOOL
12	Programmable module installation	5.20	XTOOL
13	Online ECU Programming	5.20	XTOOL
14	Key Programming	21.00	XTOOL

IP919 Pro

SBOM (Software Bill of Materials) [For Device is not Inherent compliance]			
Section	**Component Name**	**Version**	**Supplier**
1	Full system	5.7.57	XTOOL
2	Auto VIN	5.7.57	XTOOL
3	Read ECU Info	5.7.57	XTOOL
4	Read code	5.7.57	XTOOL
5	Clear code	5.7.57	XTOOL
6	Read live data	5.7.57	XTOOL
7	Read freeze frame	5.70	XTOOL
8	Actuation test	5.70	XTOOL
9	Full special function	5.70	XTOOL
10	ECU Configuration	20.02	XTOOL
11	Offline Coding	20.02	XTOOL
12	Programmable module installation	5.20	XTOOL
13	Online ECU Coding	5.20	XTOOL
14	Online ECU Programming	5.20	XTOOL
15	Key Programming	21.00	XTOOL

E2S

SBOM (Software Bill of Materials) [For Device is not Inherent compliance]			
Section	**Component Name**	**Version**	**Supplier**
1	Full system	5.7.57	XTOOL
2	Auto VIN	5.7.57	XTOOL
3	Read ECU Info	5.7.57	XTOOL
4	Read code	5.7.57	XTOOL
5	Clear code	5.7.57	XTOOL
6	Read live data	5.7.57	XTOOL
7	Read freeze frame	5.70	XTOOL
8	Actuation test	5.70	XTOOL
9	Battery Pack Test	5.11	XTOOL
10	Full special function	5.70	XTOOL
11	ECU Configuration	20.02	XTOOL
12	Programmable module installation	5.20	XTOOL
13	Online ECU Coding	5.20	XTOOL
14	Online ECU Programming	5.20	XTOOL

E2 Pro

SBOM (Software Bill of Materials) [For Device is not Inherent compliance]			
Section	**Component Name**	**Version**	**Supplier**
1	Full system	5.7.57	XTOOL
2	Auto VIN	5.7.57	XTOOL
3	Read ECU Info	5.7.57	XTOOL
4	Read code	5.7.57	XTOOL
5	Clear code	5.7.57	XTOOL
6	Read live data	5.7.57	XTOOL
7	Read freeze frame	5.70	XTOOL
8	Actuation test	5.70	XTOOL
9	Battery Pack Test	5.11	XTOOL
10	Full special function	5.70	XTOOL
11	ECU Configuration	20.02	XTOOL
12	Offline Coding	20.02	XTOOL
13	Programmable module installation	5.20	XTOOL
14	Online ECU Coding	5.20	XTOOL
15	Online ECU Programming	5.20	XTOOL

P919 MAX

SBOM (Software Bill of Materials) [For Device is not Inherent compliance]			
Section	**Component Name**	**Version**	**Supplier**
1	Full system	5.7.57	XTOOL
2	Auto VIN	5.7.57	XTOOL
3	Read ECU Info	5.7.57	XTOOL

4	Read code	5.7.57	XTOOL
5	Clear code	5.7.57	XTOOL
6	Read live data	5.7.57	XTOOL
7	Read freeze frame	5.70	XTOOL
8	Actuation test	5.70	XTOOL
9	Full special function	5.70	XTOOL
10	ECU Configuration	20.02	XTOOL
11	Offline Coding	20.02	XTOOL
12	Programmable module installation	5.20	XTOOL
13	Online ECU Coding	5.20	XTOOL
14	Online ECU Programming	5.20	XTOOL
15	J2534 Protocol	4.70	XTOOL