

Date: 08-26-2025

Telecommunication Certification Body
UL International (UK) Ltd
Units 1-4, Horizon
Wade Road, Kingsland Business Park
Basingstoke, Hampshire RG24 8AH
United Kingdom

Subject: Class 2 Permissive Change (C2PC) Request

Applicant: ENIGMA SYSTEMY OCHRONY INFORMACJI Sp. z o.o.
FCC ID: 2BM9G-0044000901
Model number/name: Quectel EG91

To whom it may concern

In accordance with KDB 178919 D01 and FCC rule part §2.1043: Changes in Certified Equipment, the applicant hereby requests a Class 2 permissive change to the above device as detailed below:

- 1) The Quectel EG91 LTE-Cat1 module, originally certified under FCC ID XMR202106EG91AUX (grant date 06/04/2021), is used without hardware modification in the host product (OPT3+) under FCC ID 2BM9G-0044000901 under portable conditions.
- 2) There are no hardware modifications to the module and no changes to the RF architecture or operating bands compared to the configuration previously authorized under the original FCC ID. The module is integrated and used in the host product (OPT3+) in accordance with the original grant conditions.
- 3) For this C2PC, the RF tune-up table has been revised to align with the SAR evaluation for the host product under portable conditions. The maximum conducted output power targets for the relevant LTE and 3G bands have been adjusted in a more conservative manner to ensure compliance with applicable FCC SAR requirements.
 - a. The revised tune-up limits do not exceed the maximum power levels authorized under the original Quectel grant. Detailed tune-up information is provided in a separate exhibit: "ul.01.11.opt_product_specification" - for which permanent confidentiality is requested.
 - b. GSM modes, though technically available in this modem variant, are disabled in this host product since this technology is no longer supported by network infrastructure in North America; no GSM tune-up changes.
 - c. The cellular antenna used in the host product is an internal PCB-trace antenna (custom ENIGMA design), integrated on the host PCB, with peak gain 2.53dBi.
 - d. LTE band 7 has been disabled by SW and cannot be enabled by the end-user.

As a result of the changes detailed above, the following test cases have been tested to verify compliance of the modified device - please note that RF testing was performed on the final host product integrating the Quectel EG91 module to confirm continued compliance.

The following test items were evaluated on the host product "One-Piece Tracking Unit" (OPT3+) configured for portable conditions:

- 1) Radiated spurious emissions and band-edge emissions for LTE operation in Bands 2 and 5, in accordance with 47 CFR Parts 22, 24;
- 2) Radiated spurious emissions and band-edge emissions for WCDMA Band II, in accordance with 47 CFR Part 24;
- 3) Specific Absorption Rate (SAR) testing for 3G (three bands) and LTE (seven bands), including conducted output power measurements, in accordance with FCC KDB 865664 D01;

The tests were performed using the revised RF tune-up limits for the host product (OPT3+). All test results demonstrated compliance with the applicable FCC requirements.

Yours faithfully,

Cezary Maciej Dąbrowski
Elektronicznie podpisany przez
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