

To whom it may concern

Attestation Letter – Peak Power radiated Difference Justification

IC: 7812D-FBD5MY23 FCC ID: KR5FBD5MY23

Testreport original: 80131513-00

Testreport C2PC: 80286794-01

This letter explains the lower peak power measured during the current EVO update (80286794-01) compared to the original certification testing (80131513-00).

For the current testing, the device was operated using the CCC_SP3_PS0 frame format (20-byte payload: 18 bytes data + CRC16). This frame results in a lower measured peak power than the CCC_SP0_PS0 frame used during the original certification testing.

The final production hardware (FBD5 and FBD5s) and application software exclusively use the CCC_SP3_PS0 frame in normal customer operation. The CCC_SP0_PS0 frame is only utilized for internal development, debugging, and system verification purposes and is not used in field operation by BMW.

The higher-power CCC_SP0_PS0 configuration tested during the original certification represents the worst-case operating condition. Since compliance was successfully demonstrated under this more demanding condition, compliance is also maintained when operating with the lower-power CCC_SP3_PS0 production frame.

No changes have been made to the RF circuitry, antenna system, modulation characteristics, or operating frequency range. The observed reduction in peak power is solely attributable to the different frame structure used during testing.

Therefore, the lower measured peak power radiated does not result from any RF hardware modification but reflects the actual production operating mode of the device.

A handwritten signature in blue ink that reads 'M. Schuster'.

Signatory

Marie-Luise Schuster

GMA Project Coordinator

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