

May 28, 2026

Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

To Whom It May Concern:

SPOT LLC hereby authorizes **Hoosamuddin S. Bandukwala** of **HB Compliance Solutions**, 5005 S. Ash Avenue, Suite A10, Tempe, AZ 85282 USA, to act as our agent in the preparation and submission of a **Class II Permissive Change** application for the **Spot 360 / RM200M** (FCC ID: L2V-RX200M) pursuant to FCC Rules and Regulations.

SPOT LLC is the applicant of record for the certified RM200M module (FCC ID: L2V-RX200M), which is incorporated into the host end-product, the **Spot 360**. This Class II Permissive Change (C2PC) filing is submitted to reflect changes incorporated into the host device configuration and to maintain continued compliance with FCC requirements.

The Spot 360 incorporates a newly certified antenna configuration that differs from the RM200M module's original certified antenna. Specifically, the host device uses an integrated helix antenna (1.8 dBi gain) in place of the originally certified ceramic patch antenna (3.7 dBi gain). The helix antenna is a different antenna type; however, because its gain is lower than that of the originally certified antenna, this configuration falls within permissible limits. RF testing has been conducted with the Spot 360 in its actual host configuration to confirm compliance, and the associated test data is included with this filing.

The RM200M module was originally evaluated for RF exposure compliance using a Maximum Permissible Exposure (MPE) analysis, which established a minimum 20 cm separation distance between the device and the end user. The Spot 360 is a handheld personal satellite messenger and tracking device that is also worn directly against the body (e.g., attached to a pack strap, belt, or harness) during normal use. To reflect this host configuration, RF exposure compliance for the Spot 360 has been evaluated using a Specific Absorption Rate (SAR) methodology in lieu of MPE. SAR testing was performed with the device placed directly against the flat phantom (0 mm separation) on the front, back, left, and right sides of the device, in accordance with IEEE Std. 1528-2013 and FCC KDB 447498, representing worst-case body-worn use. The highest reported 1-g SAR value is 1.33 W/kg (S-Band, left side), and the highest combined simultaneous S-Band/Bluetooth 1-g SAR value is 1.37 W/kg, both of which are below the 1.60 W/kg general population/uncontrolled exposure limit. Because compliance is now demonstrated for direct body contact (0 mm separation) under the SAR methodology, the 20 cm minimum separation distance condition associated with the original MPE-based grant is no longer applicable and is requested to be removed from the grant for this configuration. The SAR test report and updated user documentation reflecting these RF exposure conditions are included with this filing.

This authorization includes the authority to complete FCC Form 731, sign all documents, and act on behalf of SPOT LLC in all matters relating to this equipment authorization application. A signed Agent Authorization Letter designating HB Compliance Solutions and TIMCO Engineering, Inc. is on file dated June 17, 2024.

I certify that all exhibits contained within this filing properly describe the device or system for which Permissive Change authorization is sought.

I further certify that appropriate arrangements, including design review, testing, and approval by Globalstar / SPOT LLC, have been made to ensure that production units utilizing the RM200M module under the referenced FCC ID will continue to comply with the Commission's requirements.

Sincerely,

Globalstar.com
FindMeSpot.com
Spot LLC is a subsidiary of Globalstar, Inc.

1351 Holiday Square Blvd
Covington, LA 70433
P: +1 (985) 335-1500



Matthew Kapral

Matthew Kapral

Sr. QA & Compliance Engineer

SPOT LLC / Globalstar, Inc.

1351 Holiday Square Blvd., Covington, LA 70433

matthew.kapral@globalstar.com | (985) 335-1649

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