



SGS North America Inc.
620 Old Peachtree Road
SUITE 100
Suwanee, Georgia 30024
United States

FCC COVERED LIST DECLARATION LETTER

Applicant Legal Business Name	Zircon Corporation		
Address	1580 Dell Avenue Campbell California 95008 United States		
FRN	0037336617		
Grantee Code	N94	FCC ID:	N94-NODE-74426
Authorized Contact Name	Marco Jacquez		
Contact Phone	408-963-4584	Contact Email	marco.jacquez@zircon.com

Zircon Corporation ("the applicant") certifies:

- the equipment for which authorization is sought is not "covered" equipment prohibited from receiving an equipment authorization pursuant to section 2.903 of the FCC rules.
- as of the date of the filing of the application, the applicant [is not] identified on the Covered list, established pursuant to §1.50002, as an entity producing "covered" equipment.
- the software to be loaded prior to marketing of the equipment identified above is not "covered" software manufactured by any entity including predecessors, successors, parents, subsidiaries, affiliates or any entity which has rebranded or relabeled the software produced by the entity(ies) identified on the "Covered List".
- the device is not capable of storing or running software listed on the covered list and therefore is inherently compliant.

Justification for compliance with the covered list:

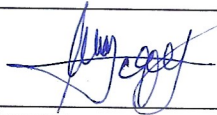
- The firmware installed prior to market launch is developed solely by our internal engineering team.
- No software from any entity listed on the FCC Covered List, or from their affiliates, predecessors, successors, subsidiaries, or any rebranded/repackaged versions thereof, have been incorporated into our device.
- The device has no capability to install, run, or store third-party firmware post-manufacture, thus precluding any potential compliance violations post-deployment. Any updates to the device can only be done using Firmware that has been developed by our internal engineering team.

Technical enforcement for the device:

- Our system has a locked bootloader that rejects any unsigned or unauthorized FW.
- Our bootloader uses cryptographic signature checks during firmware loading to ensure that only authorized FW can be loaded on the device.
- There are no end-user accessible interfaces for modifying the firmware or installing the firmware.

These mechanisms ensure that only firmware explicitly vetted and approved by our organization can be installed or executed, maintaining compliance with FCC rules regarding prohibited software and equipment

Link to the Covered List: [Covered List](#)

Applicant Signature:		Date: 2025-08-15
Print Name:	Dr. Marco V. Jacquez	
Title:	Corporate QA and EC Director	

**NOTE: This declaration cannot be signed by an Agent, it shall be signed by an authorized person listed in the FCC database*