

03/16/2026

To Whom It May Concern:

We, Axis Communications AB
hereby apply for Class II Permission Change to the approved product under PNB-LB1ZM, to portable category when applied in the **AXIS W111 BODY WORN CAMERA** due to the design of the platform resulting in less than 20 cm distance to human body, we have tested the platform with the PNB-LB1ZM device for SAR. Radiated emission testing was not additionally performed due to the following:

- The product with PNB-LB1ZM: module was assessed compliant to radiated emission limits per 15.247 and 15.407 in its initial FCC approval.
- The host antenna is designed for a lower peak gain in the intentional transmit frequency bands and therefore radiated performance in the intentional frequency bands and the spurious emissions out of bands are expected to be lower than that measured in the original modular approval.

Please kindly review the application documents submitted and grant approval for this Permissive Change application.

Sincerely yours,



Company Name: Axis Communications AB
Contact Name: Maria Lindblad
Title of Person: Engineering Manager, Regulatory
Address: Granden 1 SE-223 69 LUND Sweden
Date: 03/16/2026