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主旨: [EXTERNAL] Response to Inquiry to FCC
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***** WARNING: this message is from an EXTERNAL SENDER. Please be cautious,
particularly with links and attachments. *****

Inquiry on 03/04/2024 :

Inquiry:

Hello Sir,

We have a FCC certified module, FCC ID: VPYLBEE6XX1UR

The module supports WiFi 5G and Bluetooth.

The applicant wants to Add WiFi 2.4GHz via software and apply a NEW FCC ID.

Please see the information and test plan of data referencing:

Referenced Device

Variant Device:

Key Difference:

FCC ID: VPYLBEE6XX1UR

FCC ID: TBD

Add
WiFi 2.4GHz via software

The referenced device of the above has been granted by
FCC. The purpose of this application is to apply the above variant FCC ID via
reusing radio parameter test data from the original device per KDB484596 D01.

BR/EDR

FCC Rules

Description Of Test

Data Referencing

Comments

§15.207(a)

AC
Power Line Conducted Emission

Y

Fully leveraged

§15.247(b)
(1)

Peak Output
Power

Y

Fully leveraged with Spot
check worst-case scenarios to demonstrate compliance.

§15.247(a)(1)

20 dB
Bandwidth

Y

Fully leveraged

§15.247(a)(1)

Frequency
Separation

Y

Fully leveraged

§15.247(a)(1)(iii)

Number
of Hopping

Y

Fully leveraged

§15.247(a)(1)(iii)

Time
of Occupancy

Y

Fully leveraged

§15.247(d)

§15.205

§15.209

Radiated

& Conducted Band Edge

and
Spurious Emission

Y

Fully leveraged with Spot
check worst-case scenarios to demonstrate compliance.

WLAN 5GHz

FCC Rules

Description Of Test

Data Referencing

Comments

§15.207

AC Power Line Conducted Emission

Y

Fully leveraged

§15.407(e)

Emission Bandwidth

Y

Fully leveraged

§15.407(a)

Maximum Conducted Output Power

Y

Fully leveraged with Spot
check worst-case scenarios to demonstrate compliance.

§15.407(a)

Power Spectral Density

Y

Fully leveraged

§15.205

§15.209

§15.407(b)

Undesirable Radiated

Emissions

Y

Fully leveraged with Spot
check worst-case scenarios to demonstrate compliance.

DFS

FCC Rules

Description Of Test

Data Referencing

Comments

§15.407(h)

FCC KDB 905462 D02

TPC and DFS Measurement

Y

Fully leveraged (No Radar
detection, slave only)

Please help to confirm the test plan is accept or not? Many thanks.

FCC response on 03/04/2024

Dear Inquirer,

it appears that you submitted information in a table format, but it is not legible in the inquiry, it looks like each table item is going on a separate line. We suggest submitting the formatted content in an attachment to the inquiry. Also make sure that all the items in KDB Pub. 484596 (Data Referencing) have been addressed. A pictorial (photo preferred) description of the physical differences on the device and PCB layout is preferred.

Best regards,

OET Staff

---Reply from Customer on 03/04/2024---

Hello Sir,

Thanks for the quick reply.

Sorry for the confuse. please refer the attachment for the test plan and information about the module.

The hardware and layout between referenced module and variant module are the same. The variant module add WiFi 2.4GHz via software not hardware.

Please help to confirm this, thanks.

---Reply from Customer on 03/18/2024---

Hello Sir,

Good day.

Is there any feedback for this inquiry?

Thanks in advance.

Best Regards,
Shawn

FCC response on 03/25/2024

Dear Inquirer,

based on the information provided, we accept the data referencing proposal in this inquiry.

The spot check plan, appears to meet our guidance requirements. Please ensure that the exhibits filed for certification clearly identify the referenced data separately from the spot

check test data. The exhibits should specify for what applicable worst-case scenario the referenced data have been considered for.

In some instances, even if there could be measurements considered for Data Referencing for which the Spot Check plan may not require an actual test, the applicability of the referenced data need to be clearly demonstrated through engineering considerations.

This information should be provided up front in the exhibits, so to provide a step-by-step guide for the TCB review and check of the data that have been presented. The TCBs cannot process the applications if the information is missing or not readily available.

The acceptance of a Data Referencing proposal does not waive the manufacturer's responsibility to ensure that the data as filed provides the required demonstration of compliance. You may provide a copy of this inquiry to the TCB in support of further grant processing.

Best regards,

OET Staff

Attachment Details:

[Data referencing test plane](#)

Do not reply to this message. Please select the [Reply to an Inquiry Response](#) link from the OET Inquiry System to add any additional information pertaining to this inquiry.