

Date: 1/26/2026

Phoenix TESTLAB GmbH
Product Certification
Königswinkel 10
D 32825 Blomberg

Subject: Compliance to Items 1 ~ 9 of KDB Publication 178919
Attachment Notification 202109-001 subject to PAG C2PCPX

FCC ID: XS5-H23437

The Grantee Andrew Wireless (Grantee Code: XS5) hereby acknowledges compliance with KDB Publication 178919 Attachment Notification 202109-001: 1)

1) The requirements of § 2.1043 are fulfilled, i.e., the device's block functions for the fundamental frequency, primary modulator circuit, maximum power, or field strength ratings shall remain unchanged.

Requirement fulfilled because the Block Diagram and the certified RF parameters as listed on the GRANT remain identical. Discontinued electronic components (here coupler of the Linear Power Amplifier board) have been exchanged. The printed coupler on the board was replaced by discrete carefully selected coupler component, so that the necessary PCB layout changes kept to a minimum. Uploaded Schematics, Parts List, PCB layout document in detail the performed modifications – where the test reports confirm unchanged RF parameters.

2) Transmitter PCB layout and parts changes are only permitted if there is no change in identifying a device's form, functional specification, as initially granted or previously approved under a Class II permissive change. - Requirement fulfilled – the overall appearance of the PCB remains the same.

Neither the shape nor the size of the effected PCB varies to the original certified device. The component changes require slightly PCB layout adaptations, that are documented in detail with the internal photos and PCB layouts. Uploaded schematics and parts list document the parts exchanges.

3) PCB changes are limited to non-substantive modifications layout changes to the same size physical circuit board previously granted.

Requirement fulfilled because the overall appearance of the PCB remains the same than the originally certified one. Neither size nor shape of the PCB varies. Replaced components carefully selected to keep necessary PCB layout adaption to the minimum. Submitted internal photos clearly show the layout changes only related to the exchanged electronic components.

4) C2PCPX is not permitted to add, remove, augment, or change capabilities, such as transmitters, increased bandwidth, additional rule parts, bands, etc.

Requirement fulfilled because the performed modifications do not change the RF parameters and functionalities as originally certified and listed on the GRANT.

5) In the PAG submission for item C2PCPX, the applicant shall provide complete information on testing demonstrating that the proposed changes for fundamental emissions are unchanged within the normal, acceptable tolerances and out-of-band; emissions do not exceed the appropriate limits. The PAG submission shall include all applicable test reports and internal photos.

Requirement fulfilled: Test Reports and Test Setup Photos for each individual modified frequency band showing compliance to the requirements of Output Power, Zone Enhancer Gain, Occupied Bandwidth, Input-versus Output Spectrum, Out-of-bands Emissions and Out-of-Band Rejection uploaded. There are Internal Photos uploaded that allow a general comparison of the overall PCB and a detailed comparison of the individual portions for each frequency band.

6) The modified device shall not be marketed under the existing grant of certification before confirmation that the C2PCPX PAG is approved and granted.

Requirement fulfilled: Grantee awaits approval of this C2PCPX PAG by the FCC to gain the TCB GRANT and start marketing the modified devices.

7) Software Defined Radio (SDR) grants that use the C2PCPX procedure are not permitted to make subsequent Class III permissive changes.

Requirement is NOT applicable because the device (Equipment Class B2I) is not certified as a Software Defined Radio (SDR).

8) The C2PCPX PAG procedure has no impact on the provisions of V) of this publication for non-SDR software-only changes; thus, adding an equipment class when related to rule changes is still permitted.

Requirement fulfilled because the performed modifications do not change the RF parameters and functionalities as originally certified and listed on the GRANT.

9) Class I permissive changes are not permitted³ under this C2PCPX procedure.

Requirement fulfilled and C2PCPX applied for documented modifications.

Sincerely,



Alexander Kopp

Senior Staff Engineer Compliance

Andrew Wireless Systems GmbH

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