



March 6, 2026

Certification and Engineering Bureau
Industry Canada
Spectrum Engineering Branch
3701 Carling Avenue, Building 94
Ottawa, Ontario K2H 8S2

Subject: Declaration of Continued Compliance with RSS-247 through Issue 3 to Issue 4.

To whom it may concern:

We, Ezurio LLC (formerly known as Laird Connectivity LLC) have examined and evaluated the ISED Test Reports [3] [4] [5] associated with the following product with respect to the changes in RSS-247 from Issue 2 to Issue 3 and then from Issue 3 to Issue 4.

Model / Marketing Name: BL654 Bluetooth 5.0 BLE Data Module
Model Number: 451-00001
ISED: 3147A-BL654
HVIN: BL654

These test reports and certificates were produced when RSS-247 Issue 2 was in force prior to the end of the transition period which was 6 months beyond the month of February 2017.

The original certifications listed in REL prior to February 2017 will remain valid and compliant with RSS-247, Issue 2 and will have continued compliance with RSS-247 Issue 3 by individual inspection. The inspection criteria are based on the changes made between the two Issue versions (Issue 2 to Issue 3) [1] that impact on the technical compliance of the device:

1. Added section 2.1 to include information on the document coming into force.

Inspection Result (1): This section only applies to the document issue change document information; there is no technical compliance impact. **[Outcome: No technical compliance impact].**

2. Modified section 6.2 to clarify that different measurement methods can apply depending on the operating frequency range of the device. **[Outcome: No technical compliance impact].**

Inspection Result (2): This section only applies devices operating in the 5 GHz band. This device only operates in the 2400-2483.5 MHz band. **[Outcome: No technical compliance impact].**

3. Added section 6.2.5 to introduce the requirements for devices operating from 5850-5895 MHz and channels that span across 5850 MHz.

Inspection Result (3): This section only applies to devices operating from 5850-5895 MHz and channels that span across 5850 MHz. This device only operates in the 2400-2483.5 MHz band. **[Outcome: No technical compliance impact].**

4. Added section 6.2.5.1 to provide general information and definitions.

5. Added section 6.2.5.2 to identify the power limits associated with devices operating in the 5850-5895 MHz band.

6. Added section 6.2.5.3 to identify the unwanted emission limits associated with devices operating in the 5850-5895 MHz band.



Inspection Results (4-6): These sections only apply to devices operating from 5850-5895 MHz and channels that span across 5850 MHz. This device only operates in the 2400-2483.5 MHz band. **[Outcome: No technical compliance impact]**.

The original certifications listed in REL prior to July 24, 2025 remained valid and compliant with RSS-247, Issue 3 and will have continued compliance with RSS-247, Issue 4 by individual inspection. The inspection criteria are based on the changes made between the two Issue versions [2]:

1. Removed the restriction on operation of devices in the 5600 MHz to 5650 MHz frequency range.

Inspection Result (1): The BL654 operates only in 2400-2483.5 MHz frequency range, and this change does not affect this device. **[Outcome: No technical compliance impact]**.

2. Modified section 6.4 related to hybrid devices to introduce requirements distinguishing hybrid devices from a mere combination of FHS and DTS devices.

Inspection Result (2): The BL654 operates only in the 2400-2483.5 MHz as a Digital Transmission System device without Frequency Hopping nor Hybrid Spread-Spectrum Operation. **[Outcome: No technical compliance impact]**.

3. Removed the directional antenna/antenna array calculation since the directional gain calculation is covered in the normative reference ANSI C63.10 and the measurement procedure in the accepted KDBs.

Inspection Result (3): The requirement was removed and is covered by ANSI C63.10 and the accepted KDBs. **[Outcome: No technical compliance impact]**.

4. Added clarification for LE-LANs operating within vehicles in the bands 5150-5250 MHz and 5250-5350 MHz.
5. Modified point b) in section 7.3.1.3 related to the unwanted emissions of transmitters operating in the 5150-5250 MHz to clarify the requirement.

Inspection Result (4-5): The BL654 operates only in 2400-2483.5 MHz frequency range, and this change does not affect this device. **[Outcome: No technical compliance impact]**.

6. Added a reporting requirement to section 7.1 for devices implementing transmitter power control.
7. Modified the transmit power control requirement in sections 7.3.1.2 and 7.3.2.2.2.
8. Modified section 7.3.2.1 to introduce the indoor labeling requirement for the unwanted emissions.
9. Modified section 7.3.2.3 to clearly identify the different unwanted emission limits of transmitters operating in the band 5250-5350 MHz.

Inspection Result (6-9): Sections 7.1, 7.3.1.2, 7.3.2.2, 7.3.2.1 and 7.3.2.3 only apply to devices operating in the 5 GHz band. The BL654 operates only in 2400-2483.5 MHz frequency range, and this change does not affect this device. **[Outcome: No technical compliance impact]**.



Ezurio is committed to maintaining compliance with RSS-247, in accordance with ISSED requirements. The Regulatory Information Guide will be revised to document compliance with the most current requirements. Test Reports and Certificates will be updated as needed.

Please feel free to contact us for any additional information.

A handwritten signature in dark ink, appearing to read "Brian Petted", is positioned above a horizontal line.

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[1] Radio Standards Specification RSS-247, issue 3, Digital Transmission Systems (DTSs), Frequency Hopping Systems (FHSs) and Licence-Exempt Local Area Network (LE-LAN) Devices, replaces RSS-247, issue 2, dated February 2017.

[2] RSS-247 — Digital Transmission Systems, Frequency Hopping Systems and Licence-Exempt Local Area Network Devices in 902-928 MHz, 2400-2483.5 MHz, 5150-5350 MHz, and 5470-5895 MHz bands, Issue 4, July 24, 2025.

[3] CR813002 Rev. 01, RSS-247 Issue 2 Test Report, Issued by International Compliance Corporation, June 25, 2018.

[4] TR3664A BL654, RSS-247 Issue 3 Test Report for BLE DTS, Issued by Ezurio Test Laboratory, February 29, 2024.

[5] TR3664B BL654, RSS-247 Issue 3 Test Report for Zigbee DTS, Issued by Ezurio Test Laboratory, February 29, 2024.