



March 10, 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 associated with the following product with respect to the changes in RSS-247 from Issue 3 to Issue 4. **There were no technical compliance impacts through the standard issue change from Issue 3 to Issue 4.**

Model / Marketing Name: Sona TI351
Model Number(s): 453-00199R, 453-00199C, 453-00200R, 453-00200C, 453-00209.
ISED: 3147A-SONATI351
HVIN: Sona TI351

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 of the relevant test reports [2]-[6]. The inspection criteria are based on the changes made between the two Issue versions [1]:

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

Inspection Result (1): The TI351 does not support this frequency range, Channel numbers 120, 122, 124, 126 and 128 are not supported which precludes the use of the frequency range 5600-5640 MHz [**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 TI351 operates only in the 2400-2483.5 MHz as an independent Frequency Hopping System (Bluetooth Basic and Extended Data Rates) and as Digital Transmission System device (in two different technology modes: Bluetooth Low Energy (BLE) and 802.11 b/g/n/ac/ax WLAN). There is no Hybrid Spread-Spectrum Operation implemented. [**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

Inspection Result (4): The device is restricted for indoor use only, no vehicle or aviation operation is supported. This is explicitly stated in the Regulatory Information Guide (RIG) and Module Integrator Instructions. Outdoor application by host integrators requires additional compliance consideration and evaluation. **[Outcome: No technical compliance impact]**.

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 (5): Section 7.3.1.3 is reproduced below for the purpose of conducting a clause-by-clause inspection of the content of the currently issued test reports and the newly published requirements [1]:

7.3.1.3 Unwanted emission limits

For transmitters with operating frequencies in the band 5150-5250 MHz:

- a. All emissions outside the 5150-5350 MHz band shall not exceed -27 dBm/MHz peak e.i.r.p. spectral density.

Inspection Result (5a): The test reports for all variants were inspected and the peak, e.i.r.p, spectral density does not exceed -27 dBm/MHz for any unwanted emission test case within the 5150 MHz-5250 MHz band. **[Outcome: No technical compliance impact]**.

- b. any unwanted emissions that fall between the upper edge of the 26 dB bandwidth and 5350 MHz shall be attenuated below the channel power by at least 26 dB, when measured using a resolution bandwidth between 1 and 5% of the occupied bandwidth.

Inspection Result (5b): The test reports for all variants were inspected and there were no instances of emissions greater than -26 dB below the channel power between the upper band-edge and 5350 MHz. The upper band-edge is defined as half of the 26 dB Bandwidth plus the carrier frequency. **[Outcome: No technical compliance impact]**.

- c. if the occupied bandwidth also falls within the 5250-5350 MHz band, the transmission is considered as intentional and the devices shall comply with all requirements in the band 5250-5350 MHz including implementing DFS

Inspection Result (5c): The test reports for all variants were inspected and there were no instances of the Occupied Bandwidth falling within the 5250-5350 MHz band. The Occupied Bandwidth is the 99 percent power containment bandwidth. **[Outcome: No technical compliance impact]**.

6. Added a reporting requirement to section 7.1 for devices implementing transmitter power control.

Inspection Result (6): This device does not implement transmitter power control. **[Outcome: No technical compliance impact]**.

7. Modified the transmit power control requirement in sections 7.3.1.2 and 7.3.2.2.2.

Inspection Result (7): This device does not implement transmitter power control. **[Outcome: No technical compliance impact]**.



8. Modified section 7.3.2.1 to introduce the indoor labeling requirement for unwanted emissions.

Inspection Result (8): This is a labeling requirement which compels the device documentation to indicate that the device is certified for indoor use only. This is explicitly stated in the Regulatory Information Guide (RIG) and Module Integrator Instructions. Outdoor application by host integrators requires additional compliance consideration and evaluation. **[Outcome: No technical compliance impact].**

9. Modified section 7.3.2.3 to clearly identify the different unwanted emission limits of transmitters operating in the band 5250-5350 MHz.

7.3.2.3 Unwanted emission limits

Devices shall comply with the following:

- a. all emissions outside the band 5150–5350 MHz shall not exceed –27 dBm/MHz peak e.i.r.p spectral density.

Inspection Result (9a): The test reports for all variants were inspected and the peak, e.i.r.p, spectral density does not exceed -27 dBm/MHz for any unwanted emission test case within the 5150 MHz-5350 MHz band. **[Outcome: No technical compliance impact].**

- b. all emissions inside the band 5150–5250 MHz shall either:
 - i. not exceed –27 dBm/MHz peak e.i.r.p spectral density, or
 - ii. comply with the power spectral density for operation in section 7.3.1.2

Inspection Result (9a): The test reports for all variants were inspected and the peak, e.i.r.p, spectral density does not exceed -27 dBm/MHz for any unwanted emission test case within the 5150 MHz-5250 MHz band. **[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", with a stylized flourish at the end.

Brian Petted, Technology Leader
Ezurio LLC (formally known as Laird Connectivity)
W66 N220 Commerce Court, Cedarburg, Wisconsin USA
brian.pettied@ezurio.com
+1-262-421-4974



[1] 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.

[2] TR3818_2.4G, RSS-247 WLAN 2.4 GHz Band, Issued October 22,2025 by Ezurio Test Laboratory, Cedarburg, WI.

[3] TR3818_2.4G_RU, RSS-247 WLAN 2.4 GHz Band, Issued December 10,2025 by Ezurio Test Laboratory, Cedarburg, WI.

[4] TR3818-5G-A, RSS-247 WLAN 5.0 GHz Band (UNII), Issued October 22,2025 by Ezurio Test Laboratory, Cedarburg, WI.

[5] TR3818_5G_B, RSS-247 WLAN 5.0 GHz Band (ISM), Issued October 22,2025 by Ezurio Test Laboratory, Cedarburg, WI.

[6] TR3818_BLE, RSS-247, BLE-DTS, Issued October 22,2025 by Ezurio Test Laboratory, Cedarburg, WI.