



To: Federal Communications Commission

Authorization and Evaluation Division

7435 Oakland Mills Road

Columbia, MD 21046

USA

Date: 2026/06/04

Ref: Attestation Statements Part 2.911(d)(5)(i) and Part 2.911(d)(5)(ii) Filing Re. KDB 986446 D01

FCC ID: UU8-ROBAI28

Dear Sir or Madam,

*[Lexibook America] ("**the applicant**") certifies that the equipment for which authorization is sought is not "covered" equipment prohibited from receiving an equipment authorization pursuant to section 2.903 of the FCC rules.*

*[Lexibook America] ("**the applicant**") certifies that, as of the date of the filing of the application, the applicant [**is not**] identified on the Covered List (as a specifically named entity or any of its subsidiaries or affiliates) as an entity producing "covered" equipment .*

*[Lexibook America] ("**the applicant**") certifies that, the equipment subject to this FCC filing is a toy robot designed for children's entertainment and educational purposes. In accordance with the definition of "Advanced Robotic Devices" set forth in the FCC's Covered List determination, we further certify that this product does not fall within the scope of restricted devices based on the following justifications:*

1. Product Classification and Intended Use: The equipment is explicitly designed, manufactured, and marketed as a children's toy. It is intended for indoor recreational and basic interactive play, not for industrial, commercial, infrastructure monitoring, surveillance, security, or any operational applications that could impact national security or critical infrastructure.

2. Weight Threshold: The combined weight of the device (approx. 25 ×15 ×10 cm in dimension) is significantly below 4.4 lbs (approx. 2 kg) , which is one of the cumulative criteria for classification as an "advanced robotic device."

3. Functional Limitations:

The device's movement and navigation capabilities are basic and limited, designed solely for simple toy-like motions (e.g., forward/backward, turning) within a confined indoor play area, without



sophisticated autonomous navigation, obstacle avoidance, or ground mobility capabilities comparable to those of autonomous mobile robots, humanoid robots, or quadrupeds.

4. Exclusion for Toy-Class Devices: While the FCC's definition does not explicitly list a "toy exception" within the advanced robotic device criteria, the regulatory intent and prior exemptions (e.g., FCC DA 26-588 removing toy drones from the Covered List subject to specific conditions) demonstrate that low-risk, consumer-grade toy products are not the target of this restriction. This product falls squarely within the category of low-risk consumer toys and should be treated accordingly.

Therefore, we respectfully request that this product be processed under the standard FCC certification procedures for consumer electronics/toy devices, as it falls outside the scope of the Covered List restriction on "Advanced Robotic Devices."

If you have any questions, please contact us.

Sincerely,

Signature :

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