



December 16<sup>th</sup>, 2020

Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046

Re: Class II Permissive Change Request

To Whom It May Concern,

Enclosed please find an application for a Class II Permissive Change certification of Equipment Model **471-0008-01**, FCC ID: **2AVRK-XBS6BTH**, under Rule Part FCC 15.247.

Athena GTX is requesting use of the same module (exactly equivalent to FCC ID: **2AVRK-XBS6BTH**) within 20 cm of the body; which may be safely done based on the information provided below:

Frequency Range
2.4 GHz (2412-2462 MHz)
<i>*If the duty cycle is less than 100%, provide a justification. Consider, during normal operation, what is the maximum possible duty cycle for transmission in any portion of the band during any 6-minute period?</i>
The device only transmits 1500 bytes per 5 seconds which is ~0.24% at 1Mb/s 802.11b. The radio sends no beacon signals.

The standalone 802.11 b/g/n radio will be used with an integrated whip antenna in Athena GTX's Holistic Modular Aircrew Physiologic Status (HMAPS) family of devices. The HMAPS is intended to be used as an adult physiological and environmental monitor including heart rate, SpO<sub>2</sub>, respiration rate, acceleration, pressure, temperature and several calculated parameters to assess physiological state. The monitor uses wireless communications to transmit data to a mobile device or personal computer.

No documents changes from the original application are necessary, but testing performed by Element Materials Technology has also been included. If you have any questions regarding this application, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sean Mahoney', with a stylized flourish at the end.

Sean Mahoney  
Vice President of Operations and Regulatory Affairs, Athena GTX