

Date: June 26, 2020

Federal Communications Commission  
7435 Oakland Mills Road  
Columbia MD 21046

c.c.  
UL Verification Services  
Certification Division  
47173 Benicia Street  
Fremont, CA 94538, USA

Subject: Requesting Class II permissive change for FCC ID: 2AVYM -SX100

Dear Examiner,

The purpose of this letter is to request a Class II Permissive change for FCC ID: 2AVYM -SX100.


The major change filed under this application is:

The subject certified transmitted module is being used in a Nemuri Scan, model NN-1520U/NN-1520UP. This is a portable device and as the modular approval does not cover portable hosts this C2PC is required to add this specific host to the scope of the modular approval.

To demonstrate the compliance, following has been taken for this application:

1. SAR testing has been conducted on host equipment.
2. Radiated emission testing was not additionally performed due to the following.
  - Output power remains unchanged from original modular approval.
  - The antenna used in the host is of the same internal PCB antenna and equal gain to the one covered by the modular approval.
3. The antenna is internal PCB antenna (without PIFA Antennas of original module).
4. The software security remains unchanged from the original application.
5. 11n HT40 mode disabled by software when installing the module to host.

Sincerely Yours,



Tadashi Kawamoto  
Executive Director of Technical Engineering Div.  
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