METEORCOMM LLC

May 13, 2012

CKC Certification Services, LLC
Attn: Randy Clark
5046 Sierra Pines Drive
Mariposa, CA 95338

Subject: Application for Permissive Change of transmitter with FCC ID: BIB63010

Dear Sir:

Meteorcomm LLC (hereinafter Meteorcomm or MCC) is filing this Type II Permissive Change application for two key reasons:

1. Meteorcomm plans to implement a software change to add a new frequency range and applicable rule part to the subject wayside packet data transceiver per KDB178919 v05r02 §4a as shown in item B below.

   A. Original frequency range: 220.0125 to 221.9875 MHz, 47CFR §90T.
   B. New added frequency range: 217.6125 to 219.9875 MHz, 47CFR§80 and §90.

2. Meteorcomm is providing information regarding field software upgrades of devices not approved as Software Defined Radios specified by KDB594280 D01 v01r02, KDB178919 v05r02 §4c, and KDB388624 D02 v12 §A5. Please refer to the updated Operational Equipment Description filed with this application for further details.

Discussion of Added Frequency Range

Meteorcomm originally designed the electronic hardware of this model to be capable of functioning over the frequency range 217.6 to 222 MHz but then chose to restrict the original application for certification, and the frequency range users can select, to the 220-222 MHz range set out by Part 90 Subpart T.

Now Meteorcomm desires to make a software change that will enable the full frequency range of the hardware under the guidance of KDB178919 v05r03 §4a which is repeated here:

a) Additional frequencies may be added by Class II permissive change to an approved device under the following conditions; however, a new test report must be submitted for the new frequencies.

(i) No hardware changes have been made.
(ii) There is no increase in the output power rating on new frequencies.
(iii) The Equipment Class remains the same. (Changes that require a new Equipment Class code require a new FCC ID, except for SDR approvals.)
(iv) RF exposure changes must be addressed.
(v) Only the original equipment manufacturer may implement the new frequencies.
(vi) There are no other changes to the device that indicate a need for a new FCC ID.

Meteorcomm is submitting additional data in a test report for the added frequency range 217.6125 to 219.9875 MHz and responds to the listed conditions:

1. Hardware changes: There are no hardware changes to this equipment model.

2. RF Power: The test report shows that the maximum transmitter output has not increased in the new frequency range relative to the original frequency range.

3. Equipment Class: The equipment class remains TNB, Licensed Non-broadcast Station Transmitter for 47CFR§§80 and 90.

4. RF Exposure: Existing RF Exposure information provided for this model is not affected by the change in frequency range.

5. Original Equipment Manufacturer: Meteorcomm as grantee continues to be the sole entity to make software revisions to this model.

6. Other changes: There are no other changes to the device that indicate a need for a new FCC ID. The transmitter RF power output, modulation characteristics, occupied bandwidth, and channelization are the same as specified in the original submittal.

Accompanying Exhibits

1. Application for Permissive Change: Form 731 with attestation.

2. Attestation regarding MCC responsibility for maintaining conditions of the grant.

3. Operational Description: A revised operational description is being submitted which provides information compliant with the requirements of an application for certification specified in §2.1033. It also contains qualifying information regarding field software upgrades.

4. Block Diagram: An updated block diagram is being submitted that indicates the increased frequency range.

5. Installation and Operation Manual: Portions of the manual are being revised and submitted to indicate the new frequency range and applicable rule parts for this radio model.

6. RF Exposure Guide: The original RF exposure calculations and antenna specifications for this model still apply. An updated version of the RF Exposure Guide is being submitted because details pertaining to other radio models have changed.

7. Test report: Two new test report exhibits present transmitter conducted and radiated emissions data for the added frequency range 217.6125 to 219.9875 MHz which supplements previously filed test data for the original frequency range 220.0125 to 221.9875 MHz.

There are no hardware changes and therefore no changes to the previously submitted Schematics or Parts List.

Statement of Test Supervisor

Conducted test data collection was supervised by me. Radiated test data collection and reports were prepared by CKC Laboratories, Inc, Bothell, Washington.

Sincerely,

John F. “Fred” Cleveland
Principal RF Design Engineer