

October 21, 2024

Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Subject: Class Two Permissive Change – SAR Exemption  
FCC\_ID: P8M-GPS900

To Whom It May Concern:

In accordance with KDB 178919 D01 and FCC Part 2.1043 - changes in Certified equipment, we are submitting this C2PC to update the RF exposure classification to add a portable classification. This request pertains to the Specific Absorption Rate (SAR) exemption based on maximum time average power, frequency, and separation distance as outlined in the operational description.

Summary of Change:

- The Silicon Labs RS9116W-SB00-B00 (M4SB) 802.11bgn Wi-Fi communication module itself has not changed. The RF characteristics, Hardware, Power, and all specifications remain the same.
- In accordance with KDB 178919 D01 and FCC Part 2.1043 - changes in Certified equipment, we are submitting this C2PC to establish a portable category SAR condition for the for GPS900 and GPS910 series ankle worn tracking device.
- SAR Exemption Justification: According to FCC KDB 447498, the radio module listed qualifies for a SAR exemption based on maximum time average power, frequency, and minimum test separation distance of 26 mm.

Supporting Documentation:

- SAR exemption report

This C2PC will change the following:

- Update the RF exposure grant conditions.
- The Bluetooth modes supported within the RS9116 B00 module are disabled.
- Add the following description in the grant:  
“This module is approved in portable configurations based on maximum time average power, frequency, and a minimum test separation distance of 26 mm. SAR testing was performed to demonstrate RF compliance.”

We affirm that no other changes have been made to the device except for the ones specified above, and that the device continues to meet all relevant regulatory requirements. If you have any questions or comments, please do not hesitate to contact me.

Sincerely,



Don Pruitt  
Senior Firmware Engineer



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