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To whom it may concern:

The enclosed documents constitute a formal submittal and application for Equipment Authorization under a Class 2 Permissive Change / Reassessment for a modular, composite device pursuant to the following rules:

Subpart C of Part 15 of FCC Rules (CFR 47) – 15.247 (DTS)
Subpart E of Part 15 of FCC Rules (CFR 47) – NII
Industry Canada RSS 210

This application, under FCC ID PD962205ANHU and Industry Canada certification number 1000M-62205ANHU (C/M 62205ANHU, is for a limited single modular approval allowing installation by the end user into devices that have a BIOS lock to ensure that the module is only used in approved systems. Descriptions of the BIOS lock associated with this approval for two different integrators were uploaded as part of the operational description during the original certification and these descriptions remain unaffected by the proposed changes.

The proposed changes are to add a new dipole antenna, part number WNC P/N 81XCAA15.G03. The original certification covered a PIFA-style antenna. The specifications for the original and new antennas are detailed below:

Band	Antenna Gain	
	Original PIFA	New Dipole
200-2483.5 MHz	3.2 dBi	Tx/Rx1: -0.45 dBi Tx/Rx2: 1.26 dBi
5150-5350 MHz	3.7 dBi	Tx/Rx1: -0.36 dBi Tx/Rx2: 1.58 dBi
5470-5725 MHz	4.8 dBi	Tx/Rx1: -0.07 dBi Tx/Rx2: 1.01 dBi
5725-5850 MHz	5 dBi	Tx/Rx1: 0.83 dBi Tx/Rx2: 1.09 dBi

As the new antenna has lower gain than the previously certified antenna only radiated spurious emissions have been evaluated. Antenna port measurements for power, bandwidth etc remain unaffected by the change as the new antenna, having lower gain than the PIFA antenna, will comply with any eirp limits for the intentional signals without further evaluation.

The proposed change does not affect the characteristics of the device with respect to the FCC filing for a PC peripheral made as part of the original device filings under equipment code JBP. this change only affects the equipment types NII and DTS.

As the original antenna has higher gain than the new dipole antenna the rf exposure exhibit, also included with the application, remains unchanged and uses the eirp values from the original filing as representing the worst-case rf exposure configuration for the module when used in mobile host systems.

In addition, as RSS Gen was updated since the original approvals were granted, a user manual has been provided with this application to demonstrate compliance with requirements for user warnings to be in both English and French. There is one French language statement required by RSS 210 that is missing from this manual. In lieu of providing a version of the manual with this statement, Intel has provided an attestation that they will revise the manual appropriately.

Elliott Laboratories, as duly authorized agent prepared this submittal. A copy of the letter of our appointment as agent is included with the application.

If there are any questions or if further information is needed, please contact Elliott Laboratories for assistance.

Sincerely,



Mark Briggs
Staff Engineer

MB/dmg