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May 24, 2010

IC CERTIFICATION #: 1000M-633ANHU
FCC ID: PD9633ANHU

To whom it may concern:

The enclosed documents constitute a formal submittal and application for a Class II Permissive change / Reassessment for an NII/DTS wireless LAN module pursuant to the following rules:

> Subpart E of Part 15 of FCC Rules (CFR 47), UNII Devices
> RSS-210, Issue 7, June 2007, "Low-power Licence-exempt Radiocommunication Devices (All Frequency Bands): Category I Equipment"

The module was approved under three separate rule parts – DTS (2.4GHz and 5.7GHz bands), NII (5250-5250, 5250-5350 and 5470-5725 MHz bands) and JBP (PC peripheral). The proposed change is to add a new antenna of the same type as the PIFA antennas originally approved with the device but with a slightly higher gain in one of the NII operating bands on Chain C. The original and new antenna characteristics are detailed below and detailed specifications of the new antenna will be uploaded as an operational description as they are to be held confidential.

Antenna Name and model	Chain	Type	Antenna Gain				Comments
			2.4GHz	5.2GHz	5.5GHz	5.7GHz	
Universe	A,B,C	PIFA	3.24	3.73	4.77	4.97	Original Antenna tested
Quanta Smart Approach							
SE-07200-EQQU8	A	PIFA	-0.88	1.58	0.21	-0.8	Proposed new antenna
SE-07200-EQQU8	B	PIFA	1.06	1.26	0.23	-0.01	Proposed new antenna
SE-07200-EQQU8	C	PIFA	-0.28	**4.66**	3.9	3.53	Proposed new antenna

As the maximum output power ratings have not been changed the original antenna port conducted measurements for power, power spectral density, bandwidth, peak excursion and spurious emissions remain valid.

The proposed change does not affect the characteristics of the digital device (PC peripheral) reported in the original filing under equipment code JBP, therefore no C2PC is being submitted for the JBP portion of the device, and the new antenna set does not degrade the characteristics of the DTS aspect of the device, so the DTS portion is considered a Class 1 Permissive Change.

As this is a request for a Permissive Change / Reassessment the only documents being uploaded are the application forms, test report, rf exposure calculation and antenna information (submitted as part of the operational description). All other documents originally uploaded remain unchanged. American TCB handled the original Industry Canada assessment and should have all the relevant documents on file covering operation in the other bands. Please advise if any of the previous documentation is required to allow you to complete this re-assessment.

The MPE calculation has been updated to reflect the higher gain in the 5150-5350MHz band and, along with the appropriate RSS-102 forms, has been uploaded. It should be noted that FCC ID PD9633ANHU does have a SAR evaluation for specific host systems, but this new antenna is not intended for use with those host systems, therefore the SAR information on file with the FCC is considered to remain unaffected by this proposed change.

The module was approved with limited modular approval to allow installation by the end user into host systems that ensure use of the appropriate antennas by means of a BiOS Lock mechanism. Although the proposed change does not affect the BiOS Lock mechanisms previously described, the description has been provided with this application.

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