Federal Communications Commission
7435 Oakland Mills Road
Columbia, Maryland 21046
USA

Date : 10/22/2021

Ref: FCC Class II Permissive change for FCC ID: **PD9AX201NG**

Dear Examiner,

This is to request a Class II permissive change for module approval FCC ID: **PD9AX201NG**, originally granted on **01/28/2019**.

This change establishes portable category SAR conditions with time averaging SAR (TAS) algorithm for the HP model HSN-I41C-4 PC with AWAN AUP6Y-100071(Tx1) and AUP6Y-100072(Tx2) antennas, Hong Bo 260-27442(Tx1) and 260-27441(Tx2), WNC 81EABD15.G06(Tx1) and 81EABD15.G05(Tx2) antennas. Antenna(s) are of the same type and lower gain from original approval. SAR testing was performed to demonstrate RF compliance.No changes made except for the WLAN TAS implementation. Our intention is to show a full PAG review was previously performed under KDB 968002. We believe this application meets the conditions for special RF exposure compliance. The exact same WLAN authorized modules are re-used in this PC with the exact same algorithm and validation methods for time averaging SAR as approved in KDB 968002.

Sincerely,

By: _Steven C Hackett_ (signature)

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Title: Steven C. Hackett
          Wireless Regulatory Engineer

On behalf of: Intel Corporation

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