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

Date : 04/24/2023

Ref: FCC Class II Permissive change for FCC ID: **PD9AX211D2**

Dear Examiner,

This is to request a Class II permissive change for module approval FCC ID:
PD9AX211D2, originally granted for DSS, DTS,UNII on **02/26/2021** and for 6XD on **04/26/2021**
UNII-4 on **03/28/2022**.

Change #1: This change establishes portable category SAR conditions for the HP model
TPN-C162 Convertible PC with Pifa antennas (Part numbers: AUP5Y-100007, AUP5Y-100008
WA-P-LE-02-084 and WA-P-LE-02-085.

Our intention is to apply the PAG re-use process for granting approval due to the Dynamic SAR
feature using G/Hall sensors. The seed PAG under TXSENS was previously performed under
ATCB029625.
The WLAN TAS feature is enabled. The exact same WLAN authorized modules are reused in
this notebook with the exact same TAS algorithm validation methods for time averaging SAR as
approved by FCC.

The Contention based protocol (CBP) testing was done in conducted at the RF port of the
module with a worst case of lower antenna gain of -2dBi. The lowest antenna gain of the host is
0.08dBi passing the CBP requirement.

Sincerely,

By: _____
           Benjamin LAVENANT
Title: Regulatory Engineer
On behalf of: Intel Corporation
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Intel Corporation

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