



March 9th, 2021

Intel Corporation

100 Center Point Circle, Suite 200
Columbia, South Carolina 29210
USA

Attention: Steven Hackett

The Certification and Engineering Bureau (CEB) of Innovation, Science and Economic Development Canada (ISED) has completed a review of Intel's Dynamic Power Control and SAR Averaging (DPCSA) algorithm implemented in the Intel AX201 WiFi 6 Chipset that is fully contained within the AX201D2W Module.

The following factors were considered in making a decision regarding Intel's Time Averaging SAR (TAS) implementation:

1. Review of the following technical reports:
 - 210212_DPCSA_Op_Report_ISED_AX201D2W_Rev02.pdf
 - 210212_WiFi_TAS_Val_Report_AX201D2W_ISED_Rev02.pdf
2. CEB's validation of the Intel AX201 WiFi 6 Chipset incorporated within the AX201D2W Module.
3. The requirements specified in the following publications:
 - [Radio Standards Specification 102, Radio Frequency \(RF\) Exposure Compliance of Radiocommunication Apparatus \(All Frequency Bands\), Issue 5 \(RSS-102\)](#)
 - [Health Canada's Limits of Human Exposure to Radiofrequency Electromagnetic Energy in the Frequency Range from 3 kHz to 300 GHz \(Safety Code 6 2015\)](#)
 - [Technical Guide for Safety Code 6: Health Canada's Radiofrequency Exposure Guidelines](#)

After having carefully considered the above-mentioned factors, the CEB is approving Intel's TAS algorithm provided that the following conditions are met:

- A. ISED's approval is required prior to making any changes to the current TAS algorithm version of Intel's AX201D2W module that would render the documentation outlined above obsolete.
- B. Intel will fulfill their commitments to ISED as stated in their letter titled "ISED WLAN TAS Attestation_OEM Support.pdf"; which states that Intel shall:
 - a. Provide support and oversee the host integration, validation and SAR compliance for all host integrations.
 - b. Provide each host manufacturer with an authorization letter stating that they (the host) are a preferred OEM customer. This letter shall also clearly indicate that Intel authorizes the OEM customer to integrate Intel's certified module into their host product.
- C. A Class 3 Permissive Change application shall be submitted for the AX201D2W module with a new Firmware Version Identification Number (FVIN) reported to enable the TAS algorithm. Existing SAR values shall be removed.



- D. Each new host product will be certified via a Class 4 Permissive Change and shall obtain a pre-approval letter from ISED before the Class 4 Permissive Change certification application is submitted to the Department. A complete RF exposure technical brief and supplemental TAS validation report for the new host shall be included in the certification filing.
- E. A Class 4 Permissive Change application shall be submitted for any existing products that were previously certified without the TAS algorithm enabled, prior to enabling the TAS algorithm for these products. A supplemental TAS validation report for the host shall be provided if there is no change to the RF output power that was originally listed. In the event that there changes made to the RF output power, the host RF exposure shall be reassessed and an updated RF exposure technical brief, along with a supplemental TAS validation report for the host, shall be provided.
- F. The TAS validation report shall contain configurations previously evaluated by Intel and any additional host-specific configurations and modes of operation that have not been previously assessed shall be evaluated by Intel, including but not limited to:
 - a. Simultaneous transmission;
 - b. Additional TAS Output power parameters not already evaluated or characterized;
 - c. Change in exposure conditions;
 - d. Proximity sensor operating in conjunction with the TAS algorithm;
 - e. Other sensors used to determine exposure condition or mode of operation;

Please note that as per the requirements set forth in RSS-Gen, Issue 5, section 2.6.1 ***No person shall import, distribute, lease, offer for sale, or sell Category I radio apparatus in Canada unless they are listed on ISED's Radio Equipment List (REL).***

Intel shall also be aware that this approval letter does not circumvent the responsibility of the Certification Body to carry out a full review of the product's certification package.

Please provide a copy of this letter along with the RF exposure technical brief when submitting the required documents for certification.

Yours sincerely,

Stéphane Proulx

Director | Directeur

Spectrum Engineering Branch | Direction générale du génie du spectre

Spectrum, Information Technologies and Telecommunications Sector | Secteur du Spectre, des technologies

de l'information et des télécommunications

Innovation, Science and Economic Development Canada | Innovation, Sciences et Développement économique Canada

3701 Carling Avenue, Building 94 | 3701 avenue Carling, Édifice 94

Ottawa ON K2H 8S2

Stephane.Proulx@canada.ca

Telephone | Téléphone 613-291-9279

Facsimile | Télécopieur 613-990-4752

Government of Canada | Gouvernement du Canada