



American Certification Body
6731 Whittier Avenue Suite C110
McLean, VA 22101
USA

Date : 03/01/2023

Ref: FCC Class II Permissive change for FCC ID: PD9AX211NG

Dear Examiner,

This is to request a Class II permissive change for module approval FCC ID: PD9AX211NG, originally granted for DSS, DTS, UNII on 02/17/2021, for 6XD on 04/26/2021 and for UNII-4 on 08/29/2022.

Change #1: This change establishes portable category SAR conditions for the HP model TPN-C165 Convertible PC with Pifa antennas, Vendor 1: 48EABP0R, 48EABP0S, Vendor 2: 219HCTN12274, 219HCTN12275.

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 1.08 dBi passing the CBP requirement.

Sincerely,

By:

Steven C. Hackett

Title: Wireless Regulatory Engineer

On behalf of: Intel Corporation

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